

**Hackensack University Health Network
Governance Policy Manual**

**Discounted or Free Medical Services for Members of the Board
and the Medical Staff**

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Purpose To comply with state and federal law regarding the waiver of co-payments and deductibles, and the provision of free care to members of the Board and the Medical Staff.

Note: The waiver of co-payments and deductibles generally raises insurance fraud, contract law, and False Claims issues. Additional consequences arise under the intermediate sanctions rules when a waiver, discount or free care is provided to trustees of the exempt organization. Further, the provision of remuneration to physicians raises issues under the self-referral and anti-kickback statutes.

Definitions:

“Covered Individual” means a member of the Board of Governors and a member of the Medical Staff of the Medical Center.

“Family Member” shall mean a spouse or significant other, household member and direct lineal ancestors and descendants.

“Free” means that there is no expectation of any form of payment from any payor source.

“The Corporation” means Hackensack University Health Network and its Subsidiaries and their officers, trustees, employees and agents.

“Waiver” means a release from a payment obligation.

Policy:

No Covered Individual, on his or her own behalf or on behalf of any Family Member, may solicit or receive from the Corporation:

- a. A waiver of any applicable co-payment or deductible for health care items or services rendered to the Covered Individual by the Corporation;
- b. Free health care items or services provided by the Corporation; or
- c. A discount or other reduction in the price of health care items or services provided by the Corporation unless expressly permitted by another policy of the Corporation or the applicable payor contract.