The member agencies of the Home Care Alliance of Massachusetts have a zero tolerance policy for fraudulent Medicare activity whether it occurs via incompetence or criminal intent. Home care agencies or other providers that encounter or are approached to participate in prohibited behaviors are encouraged to report it to one of the following:

**US DEPARTMENT OF HEALTH & HUMAN SERVICES**

**PHONE:** 1-800-HHS-TIPS (1-800-447-8477)

**FAX:** 1-800-223-2164 (no more than 10 pages)

**EMAIL:** HHSTips@OIG.HHS.gov

**MAIL:**
Office of Inspector General
Department of Health and Human Services
ATTN: HOTLINE
PO Box 23489
Washington, DC 20026

**ONLINE:** [http://oig.hhs.gov/fraud/hotline/](http://oig.hhs.gov/fraud/hotline/)

Home health services are an essential part of the care continuum and Massachusetts agencies strive to provide quality care and comply with Medicare policy. While several prominent fraud and abuse investigations have focused attention on agencies submitting falsified claims for clients whose conditions clearly do not warrant Medicare coverage, regulators have also increasingly begun looking into questionable practices in such areas as case finding; patient steering; and referral relationships, including payments or other inducements intended to influence referral decisions.

All entities working with home health care agencies should be aware that the following practices are prohibited and should be reported to federal authorities:

- Collaborating to provide, or encouraging beneficiaries to seek, services that are unnecessary.
- Providing a patient with a daily insulin injection when the patient is capable of self injection.
- Inflating a therapy evaluation or need in order to assure a higher “case mix” payment.
- Certifying a client as “homebound” who is capable of seeking medical treatment outside the home without significant or taxing effort.
- Requiring providers to pay referral fees for discharges.
- Providing inducements to steer referrals are also prohibited. Examples include:
  - Making a cash payment per referral
  - Hiring a relative of a physician or other referring entity for the purpose of steering clients.
  - Offering a nursing home a staff member paid by the home health agency to cover certain shifts or manage the discharge process.
  - Overpaying for a contracted services, e.g., renting space in an assisted living facility at a higher than market value.

Questions?

**Contact:** Home Care Alliance of Massachusetts ~ 617-482-8830

[www.thinkhomecare.org](http://www.thinkhomecare.org)