

**AT BRISTOL, COMPLIANCE FORMS THE BACKBONE OF THE COMPANY,**  
*which is very different from many hospice companies that view compliance as  
an add-on program and an often ignored after-thought.*

Bristol Hospice started as a company in 2006. ***It is no coincidence that at the same time Bristol hired its own Corporate Compliance Officer and created its own Corporate Compliance Program.***

- **What does compliance with Anti-Kickback and Program Fraud and Abuse really mean?**
  - Hospice programs must identify the risks and have mechanisms in place to minimize those risks. Those are the same risks that the OIG addressed in its most recent July Hospice Oversight report.
    - *Briefly, hospice risks are the actions that contribute to unjustified payments to the hospice program because the hospice patient was not eligible for hospice benefits and/or did not receive the care that they should have received, and that Medicare paid to the hospice on behalf of the Medicare beneficiary/hospice patient.*
- **Compliance also means keeping current with laws and having mechanisms in place that protect the privacy of patient information and security our patient medical record.**
  - *At Bristol, current compliance program processes and procedures undergo constant monitoring, review and updating by the Corporate Compliance Officer and the Compliance Council.*
- **Bristol Compliance Oversight has many aspects, including:**
  - Bristol reviews every bill for hospice services for accuracy and documentary support of services billed, before Bristol submits those bills to Medicare for payment.
  - Bristol closely monitors its medical services and documentation of those services to verify that all necessary hospice services are provided as needed to its patients.
  - No patient is put on hospice service without a prior authorization and review by a hospice physician who determines appropriateness of care and needed level of care.
  - Bristol adopts an interdisciplinary review team process, led by the hospice physician, for patients that continue on hospice past this six month period, because hospice eligibility requires a determination that the patient has a life expectancy of six months or less if their disease runs its normal course.
  - Bristol has hospice expertise specialists in its coding and billing department as a component of its compliance oversight program.
  - Bristol involves clinical reviewers to certify initial and continuing hospice eligibility which is a step above many other hospice programs that have non-clinical, census driven marketeers who solicit Medicare beneficiaries for hospice participation.

**AT BRISTOL HOSPICE,  
WE ARE SERIOUS ABOUT COMPLIANCE.**