

## Eli's Hospice Insider

### Enrollment: Surprise! Meet Your 'Affiliates' Under New Rule

**Broad definitions may lead to some unexpected partners.**

A new burden has fallen into hospices' laps, thanks to the new program integrity final rule on enrollment.

One of the first steps to comply with the rule is figuring out who or what counts as "affiliated." This criteria set out by the **Centers for Medicare & Medicaid Services** in the rule spells out that affiliated providers you are responsible for tracking are those with (emphasis added):

- (1) A **5 percent or greater direct or indirect** ownership interest that an individual or entity has in another organization.
- (2) A general or limited partnership interest (**regardless of the percentage**) that an individual or entity has in another organization.
- (3) An interest in which an individual or entity exercises operational or managerial control over, or directly or indirectly conducts, the day-to-day operations of another organization (including sole proprietorships), either under contract or through some other arrangement, **regardless of whether or not the managing individual or entity is a W-2 employee of the organization.**
- (4) An interest in which an individual is acting as an officer or director of a corporation.
- (5) Any reassignment relationship under § 424.80.