

## Eli's Hospice Insider

### See What Whistleblowers are Alleging

Your best course of dealing with whistle blower actions is to stop them before they start. Taking internal complaints seriously is vital.

Encourage people to come forward with their concerns, said attorney **Mary Michal** with Reinhart Boerner VanDeuren of Madison, Wis. When an employee's take on compliance differs from that of your agency, take the time to help them understand your stance and why you take it.

Michal sees the following common whistleblower allegations:

- Admission of ineligible patients
- Admission of patients with long length of stay and ill-defined diagnoses
- Delays in discharging ineligible patients
- Backdating physician certification or recertification of terminal illness
- Providing kickbacks to nursing home employees
- Paying incentive compensation that results in the retention of ineligible patients
- Offering to provide free goods or services to Medicare beneficiaries to encourage them to enroll in hospice
- Alteration of clinical documentation to portray the patient as eligible for hospice