

POLICIES & PROCEDURES

TITLE: FINANCIAL INCENTIVES POLICY V 14.0

APPROVAL:

Approved By:

12/26/2021

Review Date

M. Bojkovic

Michael Bojkovic, CEO

1/14/2022

Effective Date

12/26/2021

Revision Date

BACKGROUND

FOCUS Health (FH) is committed to high ethical standards of business conduct. FH is committed to ensuring that our referring entities' (client companies') members are clinically reviewed with no influence of financial impact on decisions. Therefore, policies regarding financial management, compensation and incentives are necessary in order to maintain these standards.

POLICIES

Financial Incentives Policy

- FH shall not compensate our peer-reviewers or CMO based on approvals or denials of reviews (determinations) in any way.
- FH policy strictly prohibits the consideration of financial compensation to any FH staff member or contracted peer reviewer as a factor in rendering any determination.
- FH compensates peer reviewers on a fixed-rate basis in an effort to ensure that financial compensation is not a factor in review determinations.

PROCEDURES

'Provider Master Services Agreement' (Contract) between FH and Peer Reviewer

- Each peer reviewer shall sign a 'Consultant Letter of Agreement' which clearly states the FH financial incentives policy:

III: COMPENSATION

'CONSULTANT shall not take into consideration any financial compensation provided by FOCUS Health, Inc. when rendering a determination for any case whatsoever.'

- FH shall distribute this policy to all Peer Reviewers and staff annually. Each staff member and Peer Reviewer must acknowledge receipt and attest to adherence to this policy.

Training

- Each peer reviewer and staff member will receive training, either provided telephonically and/or in person, which reiterates this policy, via verbal communication and/or in printed materials.

BREACH OF POLICY

- In the event a peer reviewer breeches the FH policy as defined, the peer reviewer is instructed to immediately report the breach to the Medical Director or Chief Executive Officer of FOCUS Health, Inc.
- The peer reviewer shall be immediately terminated by FOCUS Health, Inc.

- END -