



# Hospice Physician Contracting Checklist

Mary Michal, JD  
Reinhart Boerner Van Deuren s.c.  
22 East Mifflin Street, Suite 600  
Madison, WI 53701-2018  
Telephone: (608) 229-2200  
Fax: (608) 229-2100  
mmichal@reinhartlaw.com

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1. Are the medical director's and hospice physicians' contracts in writing?
2. Does the physician have clearly delineated duties?
  - » Administrative
  - » Clinical
3. Does state law permit the hospice to employ the physician?
4. Does the contract set forth an hourly rate based on fair market value, or has an hourly commitment been estimated when establishing the salary?
5. Are there record-keeping requirements regarding duties performed and hours worked?
6. Does the agreement contain questionable incentives?
7. Does the physician refer patients to the hospice? If so, have anti-kickback prohibitions been reviewed?
  - » Does the contract fall within the safe harbor?
8. Can the hospice terminate the agreement without cause?
9. What are termination provisions "for cause?"
10. Has the hospice evaluated the appropriateness of its employed physicians' Medicare and Medicaid billings?

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