

MedPro Systems® and SAP® Concur® Offer a Comprehensive Approach to Stark Law Compliance

Together MedPro Systems and SAP Concur offer solutions for monitoring and tracking expenses made to physicians to comply with Stark Law.

What is Stark Law?

- Stark Law is a set of US Federal laws first introduced in 1988, and later amended in 1993 & 2007, with the purpose of curbing physician self-referrals.
- Stark Law prohibits physicians from making referrals for certain “designated health services” (DHS) payable by Medicare to an entity with which the physician has a financial relationship, unless an exception applies.
- For healthcare companies, there is an exception which allows designated health services (DHS) to provide non-monetary compensation to physicians up to an aggregate amount each year, adjusted for inflation. For the calendar year of 2020, the amount is \$423.

What DHS Services are applicable for Stark Law?

- Clinical laboratory services
- Parenteral and enteral nutrients and equipment
- Physical therapy services
- Prosthetics, orthotics, and prosthetic devices
- Occupational therapy services
- Home health services
- Outpatient speech-language pathology services
- Outpatient prescription drugs
- Radiology and certain other imaging services
- Inpatient hospital services
- Durable medical equipment and supplies
- Outpatient hospital services

What are Stark Law requirements/penalties for DHS providers?

- It is up to the DHS provider to track non-monetary compensation expenses placed against physicians. If the aggregate amount for the 2020 calendar year goes above \$423, the DHS provider will face penalties including but not limited to; civil penalties per violation, exclusion from the Medicare, denial of refund from Medicare.
- DHS providers are required to record and monitor expenses placed against physicians, and any errors or overages are expected to be reported to CMS using the Self-Referral Disclosure Protocol.

How MedPro Systems & SAP Concur assist with Stark Law:

- MedPro Systems offers a comprehensive approach to Stark Law compliance via three solution offerings:
 - **MedPro Concur Connect – Expense.** The real-time integration will enable Sales Representatives to access MedPro data directly from within Concur Expense. Key identifiers concerning HCPs with expenses will be captured at the time of the engagement, greatly aiding in later matching and reporting.
 - **MedPro Concur Connect – Export.** The real-time API will extract Concur Expense data to MedPro for matching and reporting. Concur Attendee Detail Extract (ADE) files will be automatically acquired and delivered to a secure FTP site hosted by MedPro.
 - **MedPro Data Matching, Tracking and Report Creation.** After the Export process above, MedPro will automatically load the ADE files for processing and matching to our MedProID® database to aggregate costs to HCPs. Weekly reports will be generated to assist in the monitoring of expenses on physicians. The weekly reports will track unique physicians, and the current aggregate spend against them across Sales Representatives, prior to exceeding the \$423 annual limit.