

## Report on Medicare Compliance Volume 28, Number 32. September 16, 2019

### Stark Compliance Tool: Keeping Track of Incremental Expenses

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The Stark Law exception for physician recruitment has strings attached for incentives that hospitals run through physician practices. If a recruitment arrangement takes the form of an income guarantee, the amount is limited to practice expenses that are the “actual additional incremental costs attributable to the recruited physician,” according to the Stark regulations (“Va. Hospital Settles CMP Case Over Physician Recruitment Incentive,” *RMC* 28, no. 32). Here is a tool that can help hospitals track and document their incremental expenses, says attorney Bob Wade, with Barnes & Thornburg in South Bend, Indiana. Contact him at [bob.wade@btlaw.com](mailto:bob.wade@btlaw.com).

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