
SUBJECT: FRAUD DETECTION AND PREVENTION

Policy:

This policy, in written or electronic form, will be available to officers and associates of Saint Louis Regional Hospital and contractors or agents that, on behalf of the hospital, provide or authorize Medicaid items or services, perform billing or coding functions, or are involved in monitoring health care provided by Saint Louis Regional Hospital.

Information on Corporate Responsibility and Fraud Detection and Prevention

Daughters of Charity Health System (DCHS) and its hospitals are committed to complying with all federal and state laws and regulations and ensuring that billing to the Medicare program, California Medical Assistance Program (Medi-Cal), and other health care programs conforms to all legal and regulatory requirements. As described more fully below, DCHS and its LHMs have implemented a Corporate Responsibility Program, which sets forth a commitment to ethics and compliance.

1. Implementation of Corporate Responsibility Program and Standards of Conduct

Our Corporate Responsibility Program includes Standards of Conduct that provide ethical guidance in the workplace. Associates are provided with this information upon hire. The Standards of Conduct require compliance with the law, accurate and honest reporting of work, and disclosures of conflicts of interests. The Corporate Responsibility Program follows the Department of Health and Human Services, Office of Inspector General, compliance program guidance. The program is overseen by Corporate Responsibility Officers (CRO) from each hospital and at the system level. CROs provide reports to their Boards of Directors, routinely and otherwise as needed, regarding the Corporate Responsibility Program. Program effectiveness is reviewed on an ongoing basis by the board, leadership, and the CROs.

For more information, please reference the policy "Corporate Responsibility and Standards of Conduct" on the DCHS intranet site under System Office, Policies and Procedures for Corporate Responsibility.

2. Associate, Physician, Vendor and Volunteer Screening

The government maintains lists of individuals and entities that are excluded from government health care programs because they committed fraud, waste, or abuse with government funds. Associates, physicians, vendors, and volunteers are screened prior to working at Saint Louis Regional Hospital, and annually, against these government maintained lists. Should the organization find individuals or entities on this list, appropriate action is taken, which may include terminating the relationship.

For more information, please reference the policy "Exclusion from Participation in Federal Health Care Programs" on the DCHS intranet site under System Office, Policies and Procedures for Corporate Responsibility.

3. Requiring Conflict of Interest Disclosures

Conflicts of interest have the potential to compromise professional judgment due to personal or financial interests outside of work. Saint Louis Regional Hospital requires disclosures of conflicts of interest annually and as they arise, in accordance with policy. When conflicts of interest are identified, appropriate action is taken to protect the hospital and those we serve.

For more information, please reference the policy "Conflict of Interests Disclosures by the Board of Directors and Board Committees" and "Conflicts of Interests Disclosures by Covered Associates, Physician Leaders, and Other Designated Persons" on the DCHS intranet site under System Office, Policies and Procedures for Corporate Responsibility.

4. Submission of Accurate Bills / Claims

Individuals who handle billing are oriented in protocols for compliant billing upon hire and are required to complete a minimum of two hours of specialized compliance training annually. Billing systems have an automated edits system to help detect errors such as services that can't be billed or invalid codes. The various process points that result in compliant billing, such as medical necessity and accurate documentation, are examined through risk assessments and monitoring. Audits are to examine billing and coding practices also performed both internally and through external firms. Risk assessments, monitoring, and auditing are done system wide and locally by each hospital. When over-payments are identified, determinations as to repayment and/or disclosure are made and action is taken to return funds to the government, as appropriate.

For more information, please reference the policies "Billing Accuracy and Integrity" on the DCHS intranet site under System Office, Policies and Procedures for Financial Integrity and Uniform Reporting and "Corporate Auditing" on the DCHS intranet site under System Office, Policies and Procedures for Auditing.

5. Training and Education

Associates receive an orientation in compliance upon hire. This training includes a compliance overview, a description of the Corporate Responsibility Program, the Standards of Conduct, and the Values Line. Compliance training is also required annually. Specialized compliance training is provided in high risk areas, as well as areas that are identified during risk assessments, monitoring, and auditing.

For more information, please reference the policy "Education and Training" on the DCHS intranet site under System Office, Policies and Procedures for Corporate Responsibility.

6. Providing Information about Fraud and False Claims Laws

The federal False Claims Act, the federal Program Fraud Civil Remedies Act, the California False Claims Act, and certain other California statutes prohibit knowingly submitting false claims or statements to the government for payment. Although they differ in specific detail, these laws define false claims as: knowingly submitting false or fraudulent claims for payments to the government, making a false record or statement in connection with a claim submitted for payment to the government, or using a false record or statement in connection with a claim submitted for payment to the government. Violations can subject the Saint Louis Regional Hospital to significant fines and penalties.

The organization provides detailed information about the federal False Claims Act, the federal Program Fraud Civil Remedies Act, and California's civil and criminal laws pertaining to false claims and statements.

For more information, please reference the policy "False Claims Laws" found on the Saint Louis Regional Hospital intranet site, under New – Policies & Procedures – Organization Wide.

7. Investigating and Responding to Reported Concerns

Saint Louis Regional Hospital investigates suspected non-compliance to determine if there has been a violation. A policy outlining guidelines for conducting internal investigations has been developed. When misconduct is found, appropriate measures are taken, which can include disciplinary action, and/or disclosing the violation to appropriate government authorities, and/or legal action. Our policy states that associates are legally obligated to tell the truth when speaking to government authorities.

For more information, please reference the policies "Investigating, Correcting, and Reporting of Compliance Issues", "Guidelines for Internal Investigations", "Response to a Government Investigation", and "Voluntary Self Disclosure" found on the DCHS intranet site under System Office, Policies and Procedures for Corporate Responsibility.

8. Reporting Compliance and Ethics Concerns

Associates are encouraged to report their compliance and ethics concerns through their choice of venues, including but not limited to, their immediate supervisor, the Corporate Responsibility Officer, and the Values Line. The Values

Line provides an anonymous reporting option 24/7 through a toll free number, 1-800-371-2176. Reports are taken by an outside vendor for protection of identity. All concerns are evaluated for appropriate investigation and action.

The Values Line is promoted on posters throughout the hospital; associates are reminded about the Values Line in annual compliance training; and brochures promoting the Values Line and Standards of Conduct are distributed to associates upon hire.

For more information, please reference the policy "Values Line Reporting and Response" on the DCHS intranet site under System Office, Policies and Procedures for Corporate Responsibility.

REPLACES: 3/07, 3/10	
APPROVED BY	DATE APPROVED
Administration	3/03/10, 10/24/14