

	Strong Home Care Group, Inc.	Corporate Compliance
	POLICY: Compliance Education	Policy #112A
	SECTION: 100A	
	Created: 2/7/07	Reviewed: Revised:
	Approved by: Date:	Reg: 1902(a)(68) of the act Section 6032 Deficit Reduction Act COP:

Policy: Visiting Nurse Service (VNS) is committed to the highest standards of ethical and professional conduct. The Board of directors and leadership teams expect that each individual conducting business on behalf of VNS will adhere to those standards on performance of their duties. It is the responsibility of each employee, and those acting on behalf of the agency, to comply with legal and regulatory requirements and policies and procedures that apply to their position. To meet this expectation, employees should become familiar with the VNS Compliance Plan and policies and read the following Compliance Education.

Description:

1. OVERVIEW: This policy provides VNS employees, and those acting on behalf of VNS, with education regarding the compliance Program and certain laws that relate to submission of Medicare and/or Medicaid claims and protections for individuals who report billing problems. Any questions should be referred to the Compliance Officer at 787-8319.

2. EDUCATION:
 - a. VNS participates in the Medicare and Medicaid programs. These programs pay VNS to provide care to those over the age of 65, disabled or financially needy.
 - b. Medicare and Medicaid are very complex and VNS must be diligent in adhering to the rules. This is a condition that must be met in order to be reimbursed properly for services delivered.
 - c. All VNS employees who care for patients or who help bill for patient services are expected to understand the regulations that apply to their job. This includes rules that require proper documentation before billing for services. Employees are encouraged to ask the supervisor or manager questions about these rules.
 - d. The Compliance Officer is available to answer any questions concerning billing questions by calling 787-8319. In addition, the Integrity Hotline can be contacted anonymously by calling 787-8769.
 - e. The Compliance Officer develops, in conjunction with the Administrative team a detailed plan for monitoring and fixing serious billing problems. This can be found within the Compliance Plan on the VNS web site and on the internal VNS S:drive.
 - f. Employees and those acting on behalf of VNS are expected to promptly report billing problems to their supervisor or manager. They can also report this directly to the Compliance Officer (787-8319) or through the Integrity Hotline (787-8769). Failure to

report serious billing problems may subject the employee to discipline that may include termination.

- g. Serious billing problems include those that result from knowing or intentional misconduct (ie. billing for services not provided), that may affect a large number of claims, or that may have resulted in a large overpayment . Simple mistakes that affect one claim should be corrected promptly.
- h. It is very important that employees report any serious billing problems as soon as discovered to their supervisor or manager. Fraudulent billing is a serious crime. Keeping money that should have been returned may be fraudulent. People who commit billing fraud may be guilty of a crime.
- i. Billing fraud can have serious consequences for VNS. Under the False Claims Act, persons or agencies that knowingly submit false claims are subject to penalties up to 3 times the amount of the overpayment and fines of up to \$11,000.00 for each claim. In addition, they may be excluded from participating in Medicare and Medicaid.
- j. Fortunately, organizations that report billing problems to the government and return overpayments do not usually have to pay fines.
- k. VNS has many experts willing to work to resolve any potential billing problems and persons who discover problems are expected to work with these people to investigate and resolve issues. In addition, The False Claims Act provides a way for persons to bring a lawsuit on behalf of the government for violations of the False Claims Act. Employees are protected from retaliation for reporting billing problems.

Associated VNS Policies:

#101A Definitions

#102 A Responsibilities

#104A Internal Reporting/ Investigation & Enforcement of Compliance Issues

#107A Identifying and Correcting Improper Billing

#108 A Responding to Government Investigations

#115 Standards of Conduct