

UMC is committed to providing quality health care to its patients consistent with its mission and in compliance with all applicable federal and state laws and regulations. To ensure compliance with such laws, UMC has policies and procedures in place to detect and prevent fraud, waste, and abuse. UMC supports the efforts of federal and state authorities in identifying incidents of fraud and abuse.

If you have any questions about this handbook, contact:

The Compliance Officer (702) 383-6211

The Compliance Hotline (888) 691-0772

You may also contact your Supervisor, Hospital Administrator, or a member of the Corporate Compliance Committee. Compliance Committee members can be found on the UMC Intranet.

What Is Compliance?

Compliance is obeying laws, regulations, policies, and procedures related to the way we bill for services and supplies we provide to our patients. It also means obeying laws, regulations, policies, and procedures related to the way we deal with physicians and vendors. UMC expects that every UMC employee, vendor, agent or contractor will follow all laws and regulations.

What Are Some Examples of Fraud And Abuse?

Some activities that may be considered to be fraud and abuse are:

- Billing for services not provided
- Misrepresenting the services actually provided
- Billing separately for outpatient diagnostic services provided during the 72-hour period prior to an inpatient admission
- Double billing
- Upcoding to a higher level code that pays greater reimbursement
- Billing Medicare for services that should be paid by another source
- Falsely certifying that services were medically necessary
- Making or receiving payments for referrals of patients
- Receiving payments for purchasing, leasing or ordering of any goods, facilities or services
- Recommending the purchase, lease or ordering of any goods, facilities or services
- Falsifying cost report information

What Must You Do?

- Promptly report all suspected violations or questionable conduct to the Compliance
 - Hotline (888) 691-0772, a Hospital Administrator, the Compliance Officer at 383-6211,
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a Compliance Committee member, or umcsn.alertline.com

- Refuse to accept or solicit an improper personal benefit from your UMC employment.
- Disclose any financial interest or ownership you or an immediate family member has with any UMC vendor or contractor to your supervisor, a hospital administrator, the Compliance Officer, or a Compliance Committee Member.
- Refuse to make or accept a referral to any entity that you or an immediate family member has a financial interest or ownership in.
- Refuse to participate in any false billings of patients, government entities, or other payors.
- Protect patient's health information in keeping with UMC policy.
- Preserve any documents or other information relating to a request for information from a governmental entity.

Non-Retaliation Provisions

You are protected from retaliation or discrimination as a whistleblower. UMC policy strictly prohibits retaliation, in any form, against any person making a report, complaint, inquiry, or participating in an investigation, in good faith.

What Compliance Laws Should You Know?

Stark Law

You cannot refer patients to a business for a designated health service for which payment may be made under Medicare/Medicaid, if you or an immediate family member has a financial interest in that business. UMC cannot bill Medicare/Medicaid for providing designated health services pursuant to prohibited referrals.

Designated health services include: clinical laboratories, physical and occupational therapy, radiology, DME, home health, inpatient and outpatient services, outpatient prescription drugs, radiation therapy, parenteral and enteral nutrients, and prosthetics/orthotics.

Anti-Kickback

Health care providers cannot knowingly and willfully offer, pay, solicit, or receive money or other remuneration to induce someone to refer a patient or to purchase, lease, order, or recommend an item or service that is payable under Medicare/Medicaid.

False Claims Act

Health care providers cannot knowingly present or cause to be presented, a false or fraudulent claim for payment. This includes billings for medically unnecessary services or supplies, services that were billed, but not provided, Stark and Anti-Kickback violations.

Conflict of Interest

You are strictly prohibited from soliciting or accepting gifts, favors, payments, services or anything else of value which might appear to influence your actions. Additionally, you are

strictly prohibited from soliciting or accepting anything of value in exchange for patient referrals or in exchange for purchasing or leasing any item or service which may be reimbursed by Medicare/Medicaid or any federal or state health care program.

Why Is Compliance Important?

UMC, through its employees, physicians, vendors, and agents, must comply with the requirements of federal and state-funded programs. Failure to comply, or other misconduct, could result in loss of accreditation, individual and institutional civil penalties, individual criminal charges, and employee discipline up to and including termination.

- UMC's compliance program is designed to detect and prevent misconduct, and to ensure compliance with applicable legal requirements.
- UMC's compliance program provides education and training to help anyone employed by or doing business with UMC understand and adhere to the legal requirements. This helps to prevent misconduct by UMC or its employees through education and training of employees.

Is Compliance Everyone's Responsibility?

- **YES.**

What If Someone From Outside UMC Compliance, Privacy or Legal Says They Are Investigating Possible Fraud At UMC Approaches You?

- Ask for identification.
- After business hours contact the On-Duty-Administrator.
- Notify your immediate Supervisor/Administrator
- Notify the UMC Compliance Officer at 383-6211.
- Be polite and professional.

Does UMC Have A Code Of Conduct/Conflict of Interest Policy?

YES! You will find this in UMC Policies and Procedures I-268 and The Corporate Compliance Code of Conduct. These provide guidelines to ensure ethical practices.

UMC's Compliance Program

A copy of the UMC Compliance Manual is located on the UMC Intranet. Direct any questions regarding the Compliance Manual or UMC's Compliance Program to your Supervisor, the Compliance Officer, or a member of the Compliance Committee.

Here are some Web sites that will assist you with compliance issues:

www.hhs.gov - www.oig.hhs.gov - www.access.gpo.gov

COMPLIANCEHOTLINE TELEPHONE NUMBER: (888) 691-0772

umcsn.alertline.com
