

**MOUNT CARMEL
POLICY/PROCEDURE**

**SUBJECT: ORGANIZATIONAL INTEGRITY: FALSE CLAIMS ACT INFORMATION
REQUIREMENTS**

DEPARTMENT OVERSIGHT & MAINTENANCE: Administrative

PURPOSE

To establish a policy in accordance with Deficit Reduction Act of 2005 (DRA 2005) whereby employees, contractors and agents of Trinity Health receive detailed information about the federal False Claims Act and applicable state laws, as well as information regarding Trinity Health policies and programs to detect and prevent fraud, waste and abuse in Federal health care programs.

POLICY:

1. In accordance with requirements of the DRA 2005 and by the effective date of this policy, all Trinity Health organizations will provide new and existing employees, agents and contractors, written information concerning the following:
 - a. The federal False Claims Act (31 U.S.C. Sections 3729-33);
 - b. Any state laws pertaining to civil or criminal penalties for false claims and statements;
 - c. Protections provided to individuals under such laws and the role of such laws in preventing and detecting fraud, waste and abuse in Federal health care programs; and
 - d. The role of the Trinity Health Organizational Integrity Program, the Standards of Conduct, and organizational policies and procedures for detecting and preventing fraud, waste and abuse in Federal health care programs.

2. For purposes of this policy, agents and contractors shall include the following:
 - a. Independent medical staff
 - b. Volunteers
 - c. Students
 - d. Vendors
 - e. Contract workers
 - f. Board members

3. An Addendum to the Trinity Health Standards of Conduct will be provided to employees to include specific discussion of the matters in 1, above, including the rights of employees to be protected against retaliation. The supplement information will be incorporated within the Trinity Health Standards of Conduct upon its next revision.

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RESPONSIBLE

PERSONS: All colleagues, independent medical staff, vendors, volunteers, contract workers, students

REFERENCES:

Administrative P/Ps - "Organizational Integrity: Application of OIP to Business Associates"; "Organizational Integrity: Associate Training"

DEVELOPED BY: Organizational Integrity ORIGINAL DATE: 4/07
REVIEW/REVISION DATE: 4/08, 4/10, 3/12, 2/14
REPLACES: Administrative P/P "OI: False Claims Act Information Requirements"
REVIEWED BY: Administrative Policy Team 7/7/14
Organizational Integrity Council 2/28/14

__Cheryl Piatka__ 8/14/14__
Integrity and Compliance Officer Date

APPROVAL FOR IMPLEMENTATION BY: Accreditation Council
DATE: Via email vote 8/15/14