

ADMINISTRATIVE POLICY #:	1512.00
SUBJECT:	False Claims and Fraud Prevention
EFFECTIVE DATE:	May 2007
REVISION DATE:	N/A
TOTAL PAGES:	3

I. POLICY

This policy implements Section 6032 of the Deficit Reduction Act of 2005 which requires all entities that receive or make \$5 million in annual MA payments to adopt written policies that inform all employees, contractors, physicians, vendors and agents about the federal and state false claims laws and about the whistleblower provisions in these laws. HNL does not receive more than \$5 million in annual payments from MA programs; however, as a subsidiary of LVHHN, under the act, payments are to be aggregated for the purposes of the annual threshold.

II. SCOPE

All employees, contractors, vendors or agents of HNL.

III. DEFINITIONS

Refer to Attachment A.

IV. PROCEDURE

1. HNL has adopted the LVHHN network policy on False Claims and Prevention of Payment fraud.
2. HNL will provide a copy of the written policy to all employees through the HNL INTRANET.
3. HNL will provide a copy of the written policy or access to it to all vendors.
4. HNL will provide information to employees on the Deficit Reduction Act in its employee handbook.
5. HNL will provide employee education through the HNL e-learning compliance modules on Fraud and Abuse.

V. ATTACHMENTS

LVHHN Administrative Policy on False Claims and Payment Fraud Prevention

VI. DOCUMENT CONTROL

Health Network Laboratories Administration Manual
Health Network Laboratories Intranet

VII. APPROVAL

_____ Signature	_____ CEO	_____ Date
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_____ Signature	_____ Medical Director	_____ Date
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_____ Signature	_____ Compliance Officer	_____ Date
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VIII. POLICY RESPONSIBILITY

Corporate Compliance Officer

IN COORDINATION WITH:

IX. DISCLAIMER STATEMENT

This policy and the implementing procedures are intended to provide a description of recommended courses of action to comply with statutory or regulatory requirements and/or operational standards. It is recognized that there may be specific circumstances, not contemplated by laws or regulatory requirements that make compliance inappropriate. For advice in these circumstances, the policy sponsor should consult with Legal Services.

X. REVISIONS

Statement of Rights as follows:

HNL reserves the right unilaterally to revise, modify, review, rescind or alter the terms and conditions of this policy within the constraints of the law, by giving reasonable notice.