



COMPLIANCE NEWSLETTER

Heritage Provider Network *Volume 5, Issue 1*

Heritage Provider Network and Affiliated Medical Groups'

> [Compliance Plan](#) > [Policies and Procedures](#) > [Training](#)

can be located on your group's website or at

heritageprovidernetwork.compliance

REPORT!

FRAUD, WASTE, ABUSE & NON-COMPLIANCE

◆ Reports are kept confidential and may be made anonymously.

☎ Compliance Hotline: 855-682-4127

✉ Corporate Compliance
P.O. Box 7007, Lancaster 93539

◆ Report to your Supervisor, Human Resources, or Compliance Officer if you suspect any non-compliance.

◆ Report without fear of reprisal or any other penalty.

3 POSTS Your Compliance Officers REALLY Do NOT Want to See!

by Kathy Litel (HDMG) and Denise Rock (HVVMG) Compliance Officers



- 1 Anything with a photo of a patient.** The fact that someone is a patient is PHI. Unless a patient signs an authorization allowing their photo to be shared, you are at risk for violating HIPAA!
- 2 The well-meaning breach. "Happy birthday, Millie! I love being your nurse!"** Even the best intentions can pose as a HIPAA breach—does Millie want the world knowing she is a patient? What if this nurse specializes in a certain illness? Does she want the whole world knowing she has that illness?
- 3 The dignity problem. "I'm tired of cranky patients!"** What if this patient saw this post? How would they feel about being seen as "cranky"? While this post might seem benign, one can imagine statements with even more serious implications for patient dignity rights. Plus it puts our Customer Service in a negative light.

FEDERAL FALSE CLAIMS ACT (FCA)

U.S.C. §§ 3729-3733



What is the False Claims Act (FCA)?

The Federal False Claims Act (FCA) makes it a crime for any person to knowingly make a false claim or record with the government for payment. "Knowingly" can include deliberate or reckless ignorance of facts that make the claim false.

Are there penalties for violating the FCA?

Penalties for violating the FCA can be up to **three times the value of the false claim**, plus a **fine of \$5,000 to \$10,000 per claim**, and in certain situations, potential exclusion from participating in federally funded healthcare programs.

This statute has both criminal and civil penalties which may be applied by prosecution depending on the proof of intent to commit the violation.

How can you prevent fraud from occurring?

Heritage Provider Network and its affiliated entities (HPN) support compliance to this law by monitoring and auditing to prevent and detect errors in coding or billing. HPN investigates all reported concerns and billing errors discovered.

YOU can take action by informing your Compliance Officer, Supervisor, and/or Human Resources if you have any concerns about a possible false claim. You are protected from any adverse actions when you report in good faith.



HPN/Corporate

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