



At Innovis Health we strive to create an environment and culture where compliance with all applicable Federal and State laws and regulations is an integral part and essential part of doing business for all of our employees and business partners. We have developed a core set of policies and procedures that guide our compliance program and provide a strong foundation on which our corporate integrity depends.

There are five basic principles that guide all our employees and business partners in ensuring the integrity of our compliance program.

First, we will never knowingly falsify any documents or give any false information to a government agency or representative.

Second, we will never take any part in billing or charging a payer for services that were not provided, nor will we knowingly mischarge, miscode or misrepresent services that were provided.

Third, we will not pay money or give anything of value to any person in order to encourage referrals of patients for our services, or accept money or anything of value for referring business of any sort to our employees or company.

Fourth, we will not share the protected health information of any patient without proper authorization.

Fifth, we will provide a work environment that encourages our employees and business partners to bring any concerns regarding compliance with all applicable laws to their managers, administrative team, Compliance Office, and Board of Directors.

If you feel any of these principles have been violated, we encourage you to contact the Compliance Office.

Joel Haugen, MD, Chief Compliance Officer
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Julene Brown, RN, MSN, CHC, Corporate Compliance Director
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Compliance Hot Line number is 701-364-3234

Innovis Health

Policy Title: False Claims, Whistleblower Protection Education

Effective Date: 11/1/00

Reviewed/Revised: 10/01/09, 6/25/10

Type: Policy/Procedure

Approved By: Corporate Compliance Officer, Compliance Committee

Dept./Cat.: Compliance

SCOPE:

Employees, Physicians, Licensed practitioners, Business partners, Contractors and Agents

PURPOSE:

Inform employees, physicians, licensed practitioners, business partners, contractors and agents about fraud and abuse laws and whistleblower protections under the law.

INFORMATION:

Federal False Claims Act: The Federal False Claims Act applies to any type of claim submitted to the United States Government for payment. The act states that there is liability for submitting a false claim to the federal government. To be guilty of the False Claims Act, you need to have submitted a claim that you knew or should have known would result in a payment greater than would have been otherwise allowed. The fine for violating this act is \$5,500- \$11,000 per claim plus three times the damages sustained by the government.

Examples of possible violations:

- Submitting a claim that doesn't have supporting documentation
- Submitting a claim for a patient that wasn't seen by the physician submitting the claim
- Submitting a claim that has a diagnosis that will get the claim paid but is unsupported in the documentation
- Falsifying documentation to get a service paid

Whistleblower Protection: In 1986, Congress added whistleblower protections to the False Claims Act. An employee cannot be discharged, demoted, suspended, threatened, harassed, or discriminated against in terms of condition of employment by his/her employer or others for actions including investigation, initiation of, testimony for, or assistance in an action filed or to be filed.

PROCEDURE:

If you believe that someone is billing for services inaccurately, please contact the Corporate Compliance Officer or Corporate Compliance Director.

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References:

False Claims Act, 31 U.S.C Sec 3730(h).

Section 6033 of the Deficit Reduction Act of 2005