

## Fraud, Waste and Abuse

**Fraud** is defined as the wrongful or criminal deception intended to result in financial or personal gain. Fraud includes false representation of fact, making false statements, or by concealment of information.

**Waste** is defined as the thoughtless or careless expenditure, mismanagement, or abuse of resources to the detriment (or potential detriment) of the U.S. government. Waste also includes incurring unnecessary costs resulting from inefficient or ineffective practices, systems, or controls.

**Abuse** is defined as excessive or improper use of a thing, or to use something in a manner contrary to the natural or legal rules for its use. Abuse can occur in financial or non-financial settings.

Southwell Facilities will bill only for services rendered and will follow the accepted coding standards as established by official guidelines for coding and reporting. Billing practices are required to comply with the requirements of state and federal payors and conform to all payor contracts and agreements. Southwell employees and providers are required to refrain from conduct which may violate fraud and abuse laws, including the submission of false, fraudulent or misleading claims to any government entity or third-party payor, including claims for services not rendered, claims which characterize the service differently than the service actually rendered (such as “up-coding”), or claims which do not otherwise comply with applicable program or contractual requirements.

Southwell employees and providers have an obligation to ensure that all bills submitted to patients, government programs, and other payors, including private healthcare plans are accurate. Southwell employees and providers also have an obligation to properly document services billed. Substantiating medical documentation is required to be provided for all services rendered.

All employees and providers are required to exercise care in any written or oral statement made to any government agency or other payor. Southwell does not tolerate false or misleading statements by employees to a government agency or other payor. Deliberate misstatements to government agencies or other payors may expose the involved employee to criminal penalties.

Any Southwell employee or provider who discovers an error or inaccuracy in any claim for payment for health care services that has been submitted to a patient, government program or other payor should alert his/her manager or supervisor, the Compliance Officer or the Helpline immediately. Managers or supervisors who receive reports of errors or inaccuracies should first correct the error or inaccuracy and then report to the Compliance Committee the error or inaccuracy and the corrective action taken.