

ADMINISTRATION

POLICY MEMORANDUM

POLICY TITLE:	SELF REPORTING OF VIOLATIONS OF CERTAIN LAWS & REGULATIONS
POLICY NUMBER:	MCH-1063
TJC FUNCTION AREA:	Information Management
POLICY APPLICABLE TO:	All Hospital Employees
POLICY EFFECTIVE DATE:	October 12, 1999
POLICY REVIEWED:	5/3/01; 10/10/01; 5-10/5; 7/12/10; 1-5-12
POLICY REVISED:	5/3/01; 10/10/01; 7/12/2010;1-5-12

ALTERNATE WORD SEARCH: violation, law, regulation, payment, refund

POLICY STATEMENT:

Medical Center Health System will report to appropriate governmental agencies any violations of law or regulation that require the return of prior payments and make any refund that is necessary.

PROCEDURE:

- 1) Anyone with knowledge of a potential violation of law or regulation that may require the return of any prior payments to Medicare should forward to the Compliance Officer all information related to the potential violation with as much specificity as possible regarding the type of problem, the date and place of occurrence and the dollar amount involved.
- 2) The Compliance Officer will promptly collect, assemble and assess all information relating to the potential violation and will consult with the hospital's legal counsel.
- 3) The Compliance Officer and hospital legal council will determine whether a violation occurred and, if so, whether the information

relating to the violation appears to be within the scope of an on-going governmental investigation.

- 4) If it is determined that the violation falls within the scope of an on-going investigation, Outside Legal Counsel will present relevant information pertaining to the violation to the government. Such information will be provided without any payment, in anticipation that any payment due will be included in negotiations regarding the resolution of the investigation.

AUTHOR'S SIGNATURE	
	Barbara Dingman, Compliance Officer Compliance Department
AUTHORIZING SIGNATURE(S)	
	William W. Webster Chief Executive Officer
END OF POLICY	