



## What's Inside?

The False Claims Act	2
Whistleblowers?	3
How HIPAA Relates...	4
Anti-Kickbacks Statute	5
The Parts of a Corporate Compliance Program	6
Fraud, Waste & Abuse	7
Employee Code of Conduct	8
High Risk Areas for Fraud	9
Corporate Compliance Questions & Answers	10-11
Reporting Suspected Fraud	12
Final Thoughts	13

© 2018 In the Know  
[www.knowingmore.com](http://www.knowingmore.com)  
 Expires 12/31/2020  
**IMPORTANT:**

*This topic may be copied for use within each physical location that purchases this inservice from In the Know. All other copying or distribution is strictly prohibited, including sharing between multiple locations and/or uploading the file or any portion thereof to the internet or to an LMS (unless a license to do so is obtained from In the Know).*

**In accordance with industry standards, this inservice material expires on December 31, 2020.** After that date, you may purchase a current copy of the materials by calling 877-809-5515.

## A Risk Management Module: All About Corporate Compliance

### IT WAS JUST A FEW DOLLARS...

Brenda had worked as a caregiver for the same home health agency for five years. She enjoyed her job and her clients really seemed to love her. However, after going through a nasty divorce, Brenda was struggling financially. It grew harder and harder to make ends meet.

One day, her supervisor, Martha, approached her with an offer.

*"Brenda," she said. "I know times are tough for you and I'd like to help you out. But, you're going to have to do something for me in return. Don't worry...it's easy!"*

Martha went on to explain that she would pay Brenda an extra \$300 every week if she documented that each of her clients had fallen down recently, was having trouble ambulating, and needed assistance with transferring out of bed.

*"Let's face it," Martha said. "That describes most elderly people at some point, so it's no big deal! You'll be helping your clients get therapy services now...so that they won't have mobility problems later!"*

Brenda thought it over. She made about 25 home visits every week, so \$300 was just a few dollars more for each visit. And, Martha was right. Why not help prevent mobility problems from developing in her clients! In the end, Brenda decided that the extra money was too good to pass up. She followed Martha's instructions for how to document her home visits. Although she often wondered why the physical therapist never showed up to help her clients, Brenda was thrilled every week when Martha handed her an envelope containing \$300 in cash. Within two years, Brenda had paid off all her debt, including the fees to her divorce lawyer. She figured that in another year or two, she would have enough money saved to buy a house.

But, Brenda's dreams came crashing down around her when the federal government brought a lawsuit against her employer for Medicare fraud. The organization had been caught billing for thousands of physical therapy visits that never took place...and that the clients didn't need. Martha, the physical therapist, and Brenda were all named in the lawsuit.

Keep reading to learn more about health care fraud and how having a **corporate compliance program** helps fight this serious problem.

