

# Compliance Today

Preventing Fraud, Waste and Abuse



## Did you know?

The Federal Government has estimated that there are fraudulent billings to the Medicare and Medicaid programs of approximately \$100 billion per year. Due to this the Federal Government mandates companies and organizations who operate in the Centers for Medicare and Medicaid Services to have compliance programs, plans and personnel to combat cases of fraud, waste and abuse. As a member of the HRC team it is important to know that each of us play a role in ensuring that HRC maintains the reputation of conducting itself with the highest level of professional ethics. We do this by being committed to our integrity and ethical standards so that we may continue to provide quality services to the individuals, families and communities that we serve. After all, that's why we are all here!



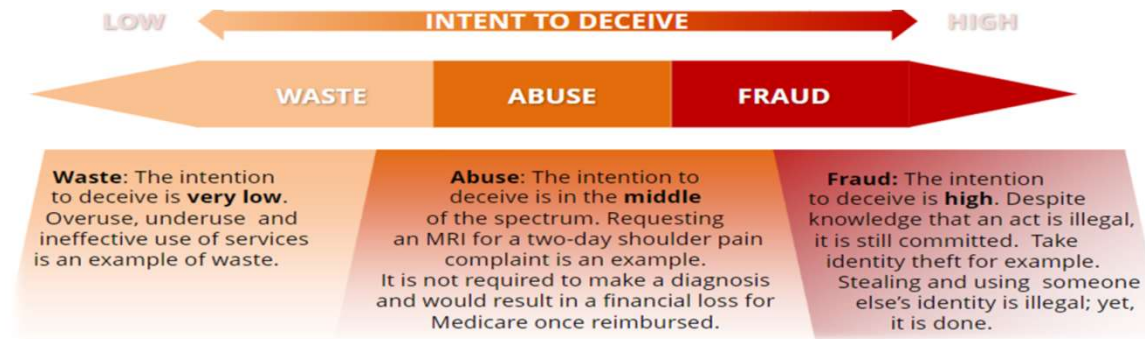
## What is Compliance?

According to the compliance consulting firm, Strategic Management Services, healthcare compliance can be defined as "the ongoing process of meeting or exceeding the legal, ethical and professional standards applicable to a particular healthcare organization or provider." The Department of Health and Human Services and the Office of Inspector General have issued guidelines for efficient compliance practices. We at HRC are committed to maintaining, upholding and enforcing a culture of compliance throughout all areas of our agency. Compliance has a range of areas that includes, but is not limited to, individual care, billing, OSHA and HIPAA privacy and security, just to name a few. In short, compliance means to meet all the rules, requirements and regulations set forth in order to provide the many services offered by The Human Resources Center.

One of the ways in which compliance is accomplished and maintained is by having established a compliance plan. HRC has a compliance plan that is considered a living document and is periodically reviewed and updated by the Compliance Coordinator, reviewed and approved by HRC's Board of Directors and HRC's Chief Executive Officer. The compliance plan is available to all employees and a copy of the plan is available upon request. All staff are trained annually regarding compliance and our compliance plan. The plan is a guide for assisting in understanding what it means to be committed to compliance and more specifically how to prevent, detect, correct and report fraud, waste and abuse.



# Compliance Today



## WASTE

Is defined as an overutilization of services (not caused by criminally negligent actions) and the misuse of resources.

### Examples of waste would include:

- Unnecessary wastage of medical supplies
- Inaccurate claims data submission resulting in unnecessary rebilling and claims

## ABUSE

Is defined as excessive or improper use of services or actions that are inconsistent with the acceptable business or medical practices.

### Examples of Abuse would include:

- Providing medically unnecessary services
- Misrepresenting services resulting in unnecessary cost to the Medicare program, improper payments to providers or overpayments.

## FRAUD

Is defined as an intentional act of deception, misrepresentation or concealment in order to gain something of value. CMS further clarifies fraud as "intentionally submitting false information to the government or a government contractor in order to get money or a benefit.

### Examples of fraud would include:

- Knowingly billing for services that were never rendered
- Knowingly billing for services at a higher rate than is justified
- Accepting bribes

## Remember:

It is essential for ALL employees to know, and abide by, their responsibilities under the Compliance Plan. "I didn't know" or "Good Intentions" will not excuse non-compliance.

If EVER you are unsure, better to be safe than sorry...

*When In Doubt, Point It Out!*

There are multiple ways in which you can report an issue or concern regarding compliance or any suspicion or concern of fraud, waste or abuse.

**First**, you can always talk with your supervisor.

**Second**, you can reach out to the in-house Compliance Coordinator and

**Third**, if you wish to remain completely anonymous you can call our compliance hotline and report your concerns to the independent outside entity that is contracted through HRC who manages Compliance Officer duties.



HRC Compliance Officer:  
Paul Stanalonis  
[pstanalonis@hotmail.com](mailto:pstanalonis@hotmail.com)  
Compliance Hotline:  
570-647-5081

HRC in House Compliance  
Coordinator:  
Michelle Mullican  
[michelle.mullican@hrcinc.org](mailto:michelle.mullican@hrcinc.org)  
570-299-3965