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| Subject: External Reporting of Compliance Concerns | |
| Date Implemented: November 30, 2006 | Date Revised: |
| Loyola University Health System/ Loyola University Medical Center | Loyola University Physician Foundation |
| Approval: Anthony L. Barbato, M.D. President and Chief Executive Officer Loyola University Health System/ Loyola University Medical Center | Approval: Stephen Valerio President and Chief Executive Officer Loyola University Physician Foundation |

I. PURPOSE

The Loyola University Medical Center (“LUMC”) and Loyola University Physician Foundation (“LUPF”) Standards of Conduct require employees to submit accurate claims for medically reasonable and necessary services *and* to charge and document services and code and bill claims accurately. This policy provides information on the laws that pertain to externally reporting of compliance concerns.

II. DEFINITIONS/APPLICATIONS

A. Definitions

False or Fraudulent Claim - False or fraudulent claims are claims that request money for services or products where the information submitted is fictitious or untrue. A false or fraudulent claim could be a bill for services and/or supplies not provided or reporting diagnoses or procedures inaccurately to maximize payments.

B. Applications

This policy applies to LUMC and LUPF employees, contractors and agents.

III. PROCEDURE/INFORMATION

A. Internal Reporting - Employees should report any and all compliance concerns by telling their supervisor, contacting the Corporate Compliance Department or the Human Resources Department. (See Reporting and Resolving Problems and Concerns Policy and Problem Reporting and Non-Retaliation Policy for more detailed information.)

B. External Reporting - External reporting of suspected False or Fraudulent Claims is an option available to employees. The Federal Government and the State of Illinois have enacted criminal and civil laws which provide for criminal, civil, and administrative penalties, provide governmental authorities with broad authority to investigate and prosecute potentially fraudulent activities and also provide anti-retaliation provisions for individuals who make good faith report of waste, fraud and abuse. (See the attached summary of false claims’ laws for more detailed information.)

IV. RESPONSIBLE PARTY

Any questions or concerns regarding this policy should be directed to the Chief Compliance Officer at x62036.

