

POLICY TITLE: UPHS Fraud, Waste and Abuse Policy
Former Policy Title: False Claims Act Compliance**POLICY PURPOSE:**

It shall be the policy of the University of Pennsylvania Health System (“UPHS”) to provide information regarding the rights of employees and contractors under the False Claims Act at the federal and state levels, and as mandated by Section 6032 of the Deficit Reduction Act of 2005 (Pub.Law. 109-171, Feb. 8, 2006).

POLICY STATEMENT:

To provide information regarding the Federal False Claims Act and relevant Pennsylvania and New Jersey State laws, including the role of such laws in preventing and detecting fraud, waste and abuse, that directly affect all health care providers receiving federal and state funds and the qui tam (“relator”) protections under these laws

APPLICABILITY/SCOPE/EXCLUSION:

This policy is applicable to all components and entities of UPHS, including but not limited to: the Hospital of the University of Pennsylvania (HUP), an unincorporated operating division of The Trustees of the University of Pennsylvania (Trustees) including its remote campus location, HUP Cedar Avenue; Presbyterian Medical Center of the University of Pennsylvania Health System, d.b.a. Penn Presbyterian Medical Center (PPMC); The Pennsylvania Hospital of the University of Pennsylvania Health System (PAH); Chester County Hospital (CCH); Chester County Health and Hospital System; Princeton HealthCare System (Penn Medicine Princeton Health and Penn Medicine Princeton Medical Center); Lancaster General Health (LG Health) and Lancaster General Hospital (LGH); Lancaster General Medical Group, The Heart Group of Lancaster General Health, Lancaster General Health – Columbia Center; Wissahickon Hospice, d.b.a. Penn Medicine at Home; Penn Medicine Home Health Lancaster General Health; Penn Medicine Princeton Health Behavioral Health; Penn Medicine Princeton Medicine Physicians; Penn Medicine Home Health Princeton Health; Penn Medicine Hospice Princeton Health; Clinical Practices of the University of Pennsylvania (CPUP); Clinical Care Associates (CCA); Clinical Health Care Associates of NJ; Penn Medicine Medical Group; the Hospital of the University of Pennsylvania Reproductive Surgical Facility; the Surgery Center of Pennsylvania Hospital; the Endoscopy Center of Pennsylvania Hospital; the Surgery Center at Penn Medicine University City, a facility of PPMC; Penn Digestive and Liver Health Center University City (PDLH), a facility of PPMC; Penn Medicine Radnor Surgery Center, a facility of HUP; Presbyterian Center for Continuing Care; all ambulatory care facilities (ACF) that are off campus departments of PPMC operating in New Jersey; and all divisions, facilities and entities within UPHS that have a CMS Certification Number (CCN) or that are operating under the license or governing body of a UPHS entity (collectively the “Entities”), excluding the Perelman School of Medicine (PSOM) except where specifically noted.

BACKGROUND:

POLICY TITLE: FALSE CLAIMS ACT COMPLIANCE

The Full Policy can found at:

https://uphsxnet.uphs.upenn.edu/Healthsvpl/legal_pdf/Fraud%20Waste%20Abuse%20Policy%20UPHS.pdf.

ROLES/RESPONSIBILITIES: N/A

APPENDICES: N/A

FORMS: N/A

REFERENCES:

Principles of Responsible Conduct

Non-Retaliation Policy

Federal False Claims Act (31 U.S.C. § 3729-3733)

Federal Deficit Reduction Act of 2005 (Pub. Law 109-171, Feb. 8, 2006)

Pennsylvania Laws (43 P.S. §§ 1421-1428; 62 P.S. §§ 1407-1408)

New Jersey Laws (N.J.S.A. 2A:32C-1 through 2A:32C-18; N.J.S.A. 30:4D-17; N.J.S.A. 2C:21- 4.2, 2C:21-4.3, and 2C:51-5; N.J.S.A. 34:19-1 through 34:19-14)

Penn Office of Audit, Compliance and Privacy

Principles of Responsible Conduct

University of Pennsylvania Health System Policy 12-1-17, Professional Fee Billing Compliance Policy

UPHS Billing Compliance Manual.

Effective Date: 01/01/24

Review History: 1/1/2021, 1/1/2022, 1/6/2023

Revision History: 1/8/2008, 12/16/2009, 1/1/2016

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