



*Policy Executive Summary & Primer*

<b>Policy Title and Number:</b>	<b><i>Detecting, Reporting, and Preventing Fraud, Waste, and Abuse (Deficit Reduction Act Policy)</i></b>	<b>GP-LL-001</b>
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*This executive summary document is intended only to provide an overview of the information contained within the policy. In no way does this document replace or supersede the content of the policy.*

***Executive Summary***

- The Detecting, Reporting, and Preventing Fraud, Waste, and Abuse (Deficit Reduction Act Policy) (“Policy”) outlines the requirements of certain federal and state health care laws and regulations, including the Deficit Reduction Act of 2005, and is intended to promote compliance with such laws.

***Key Policy Requirements***

- No employee may knowingly submit to a federal or state health care program a false claim for reimbursement or a claim that an employee suspects is false.
- The Company has adopted measures into its operations designed to detect and prevent fraud, waste, and abuse. These include:
  - **Company Compliance Officer**- who evaluates Company operations and consults counsel to ensure compliance with all applicable laws and regulations.
  - **Employee Training**- Regular employee training regarding the requirements of relevant federal and state healthcare laws.
  - **Disciplinary Action**- (up to and including termination) related to violation of Company policy or other laws, rules, and regulations.
  - **Employee Reporting**- Mechanism (including anonymous hotline) for employees to anonymously report wrongdoing without threat of retaliation or retribution.