Policy Statement:

It is the policy of Mid-Missouri Supported Living, LLC, to obey all federal and state laws, to implement and enforce procedures to detect and prevent fraud, waste and abuse regarding payments to Mid-Missouri Supported Living, LLC, from federal or state programs, and to provide protections for those who report actual or suspected wrongdoing.

Below are summaries of certain statues that provide liability for false claims and statements. These summaries are not intended to identify all applicable laws but rather to outline some of the major statutory provisions as required by the Deficit Reduction Act of 2005.

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

The FCA imposes civil liability on any person or entity who:

- Knowingly presents false or fraudulent claim for payment or approval;
- Knowingly makes or uses a false record or statement material to a false or fraudulent claim;
- Knowingly makes or uses a false record or statement material to an obligation to pay or transmit money or property to the federal government;
- Knowingly conceals or knowingly and improperly avoids or decreases an obligation to pay or transmit money or property to the federal government; or
- Conspires to commit a violation of any of the above.

Anti-discrimination / Whistleblower Protections

Retaliation against anyone who reports "good faith" fraud and abuse issues is strictly prohibited. In addition, retaliation against anyone who participates in any fraud or abuse investigations is strictly prohibited. Appropriate disciplinary action against anyone who is found to have committed an act of retaliation.

Procedure:

1. All parties will sign off on the policy and procedure manual yearly which includes this policy.
2. All parties with knowledge of potential fraud and abuse situations must report them through any of the following methods;
    a. Notification to the State Fraud Contact SIGTARP Hotline at 877-SIG-2009.
    b. Notification to Owner of Mid-Missouri Supported Living, LLC, by calling his cell @ 573-673-8437 or writing an anonymous letter to "Director" or "Owner" and mailing it to 1402 Hathman Place, Columbia, MO 65202.
    c. Mid-Missouri Supported Living, LLC, will report all confirmed allegations of fraud and abuse to the appropriate government officials.
3. Mid-Missouri Supported Living, LLC, will cooperate with federal and state agencies that conduct healthcare fraud and abuse investigations

Mechanisms for Detecting and Preventing Fraud:

The Director of Mid-Missouri Supported Living, LLC, is responsible for reviewing all billing documents and claims before submission.

The owner or designee will do periodic audits to verify the billing process.

Mid-Missouri Supported Living, LLC, has a quality assurance program to verify that charting/ documentation is completed according to state regulations. Mid-Missouri Supported Living, LLC, participates with Case Managers and Department of Mental Health auditors to verify that services are being performed that are being billed for.

Copies of all approved budgets, staffing patterns and documentation are kept on site at Mid-Missouri Supported Living, LLC, administration office for review by State officials.

Approved by: _____

Robert Palmer, RN, BSN, Owner MMSL