 PROWERS MEDICAL CENTER	POLICY NUMBER: 1001-1834 Page 1 of 2
	TITLE: Whistleblower Protections for Fraud, Waste, and Abuse Reporting Policy
DEPARTMENT: Compliance	ORIGINAL EFFECTIVE DATE: 04/14/2017 AMENDMENT EFFECTIVE DATE: 03/23/2022
APPROVED BY: Karen Bryant, CEO; Christine Bogardus, DO, Chief of Staff; and Julie Branes, Board Chair	

PURPOSE: This policy sets forth Prowers Medical Center’s policy for detecting and preventing fraud, waste, and abuse, compliance with the Deficit Reduction Act, and whistleblower protections.

POLICY: Prowers Medical Center is committed to its role in preventing health care fraud and abuse and complying with applicable state and federal law related to health care fraud and abuse. The Deficit Reduction Act of 2005 requires information about both the federal False Claims Act and other laws, including state laws, dealing with fraud, waste, and abuse (FWA) and whistleblower protections for reporting those issues. Prowers Medical Center is dedicated to ensuring compliance with federal and state laws and regulations concerning proper documentation and billing, and routinely monitors to detect and prevent FWA. Prowers Medical Center supports the efforts of federal and state authorities in identifying incidents of FWA.


Prowers Medical Center takes health care fraud and abuse very seriously. It is our policy to inform team members, contractors and agents about the federal and state false claims acts, remedies available under these provisions and how employees and others can use them, and about whistleblower protections available to anyone who claims a violation of the federal or state false claims acts.

Examples of a possible false claim

1. Making false statements regarding a claim for payment;
2. Falsifying information in the medical record;
3. Double-billing for items or services;
4. Billing for services or items not performed or never furnished.

What should be done if a possible false claim has been made:

- 1) If a team member discovers an event that is similar to one of the examples of a false claim above, he/she is encourage to do any of the following:
 - a) The team member should:
 - i) contact his/her immediate supervisor,
 - ii) enter an incident report in Healthicity’s Incident Management feature,
 - iii) or to report anonymously:
 - (1) call the compliance hotline at 855-252-7606 or its web reporting site: <https://www.complianceresource.com/hotline/>, or
 - (2) Use Healthicity’s anonymous feature in its incident reporting system

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A team member is not required to report a possible FCA violation to Prowers Medical Center first. A report may be made directly to the Department of Justice or Colorado Attorney General. However, if reported directly to Prowers Medical Center, the matter can be addressed more quickly. Prowers Medical Center encourages team members to consider first reporting suspected false claims to the hospital Compliance Officer but the choice is up to the employee.

Prowers Medical Center will not retaliate against any team member for reporting good faith concerns about potential federal or state False Claims Act violations to Prowers Medical Center or the state or federal government.

EQUIPMENT: None.

PROCEDURE: None.

DOCUMENTATION: None.

REFERENCES: None.