



Program Integrity, Fraud and Abuse

Healthcare fraud and abuse is a serious offense. Several laws describe what constitutes fraud, waste and abuse including the False Claims Act, the Anti-kickback Statute, and the Physician Self-Referral Law (Stark). You should not knowingly submit false or deceptive claims information to the government or any other payers, or ignore knowledge you may have that a claim is false. Claims for health care services should be accurate and supported by legible, properly authenticated medical record documentation. All medical records should be retained in accordance with records retention requirements. The Department of Health & Human Services, Office of Inspector General website offers a wealth of information regarding fraud and abuse prevention, detection and reporting. Members of the UConn Health Community are required to report all suspected fraud and abuse activities to your immediate supervisor; your immediate supervisor's supervisor (if the concern relates to your immediate supervisor); an appropriate manager with the UConn Health operating structure; Associate/Assistant Dean or Dean of the appropriate school; or the Office of Audit, Compliance and Ethics at (860) 679-4180, email: compliance.officer@uchc.edu or Report Line 1-888-685-2637 (anonymous reporting 24 Hours/Day, 7 Days a Week).

In addition to internal reporting options, any employee as well as persons doing business with UConn Health or members of the general public may report fraud and abuse to the State Auditors of Public Accounts. State Auditors contact information: Phone: (860)566-6150; Toll Free: (800)797-1702, Website: <http://www.state.ct.us/apa/>

For questions related to this article, please contact Margaret DeMeo, Associate Compliance Officer, at 860-679-1226 or demeo@uchc.edu

Conflict of Interest and the State Code of Ethics

Conflicts of interest may occur in a variety of research, clinical or business situations. When substantial or even potential conflicts arise, compliance with the State Code of Ethics is an important part of appropriately managing the situation. In such instances, an employee must submit a signed written statement describing the situation to his or her immediate supervisor. The matter must then be assigned to another individual who is not under the involved employee's supervision and who is completely free of any associated conflicts of interest.

Remember to seek guidance before taking any action that may lead to a potential or actual conflict of interest and possibly implicate the Code of Ethics.

Additional information and a conflict of interest disclosure form are located on the Office of State Ethics website at:

http://www.ct.gov/ethics/lib/ethics/forms/eth-coi_11-25-08.pdf.

For questions, please contact Ginny Pack, UConn Health Ethics Liaison at 860-679-1280 or pack@uchc.edu or the Office of State Ethics at 860-263-2400 or ethics.code@ct.gov.



Memo to Managers - Anonymous Reports Are a Good Thing¹

UConn Health offers a number of avenues for employees to raise questions or concerns but you, as a manager, are always our first line of defense for your team members. An alternate resource is our company's REPORTLINE which employees can use to report either anonymously or offer their name and contact information. We support and protect anonymous reporting and, as managers, it is important for all of us to align on this point and to respect this option. Anonymous reports allow our employees to make reports that they simply may not be comfortable making in person.

We also recognize that having an anonymous report lead to an investigation in our own organization can be uncomfortable. Here are some factors and guidance for you to consider should you find yourself in this situation:

- Do not feel as though employees are going above you to report anonymously. Research has shown that historically 6 out of 10 reports coming in through the hotline and web reporting channels are made anonymously so this is not unique to you or your department.
- Supporting (and not demeaning) anonymous reports or reporters shows that you want the reporting experience to remain a safe and confidential way to make a report.
- When an anonymous report comes in through our REPORTLINE, it is imperative that you do not seek out the identity of the reporter. Maintaining the integrity of anonymous reports will allow UConn Health to continue to receive actionable reports from all across locations/departments.

One critical aspect of these reports – that will assist in the substantiation of anonymous reports – is advising all reporters follow-up with their report. The Office of Audit, Compliance and Ethics (OACE) has made it part of our intake process to highlight the importance of following-up, but needs your support in reminding and encouraging employees who may report anonymously to stay engaged in the process and see it through. You can do this in a group or staff meeting as part of a discussion of the overall REPORTLINE process. If you need additional information about our processes, contact OACE at x4180 and we will be happy to assist.

We encourage all managers to embrace their role in developing the culture surrounding the use of the REPORTLINE and all of our reporting options. See UConn Health's [Reporting Compliance Concerns Policy](#). Consistent and positive encouragement can increase the effectiveness of these processes, and continue to make our workplace one where we are all invested in our culture.

¹ Taken from NAVEX Global's Compliance Communicator - March 2015

REPORTLINE
1-888-685-2637

