A. **EFFECTIVE DATE:** July 9, 2018

B. **PURPOSE:**
As required by the federal Deficit Reduction Act (“DRA”) and specific Connecticut legal requirements, all UConn Health employees, and applicable contractors and agents must receive detailed information regarding:

- UConn Health’s policies and procedures for detecting and preventing fraud, waste, and abuse, and
- Federal and state false claims laws and other state laws that pertain to civil or criminal penalties for making false claims and statements to the government, including the whistleblower protections under such laws

C. **POLICY:**
UConn Health is committed to detecting and preventing fraud, waste, and abuse. In furtherance of this commitment, UConn Health will maintain a robust and active compliance program that identifies, monitors, and manages these concerns through a multitude of institutional policies and procedures and federal/state laws. The compliance program will be overseen by a compliance officer who will be responsible for overseeing compliance activities. The program is dedicated to the training and education for employees regarding applicable laws, regulations and policies related to preventing and detecting fraud, waste and abuse. A confidential telephone reportline for employees and other individuals is available to report compliance concerns. Of note, all applicable contractors must abide by these compliance policies in their work for UConn Health. The following are essential to this comprehensive compliance program:

- A written code of conduct that establishes basic standards of workplace behavior, promotes adherence to all applicable laws, regulations and policies, and reflects the institution’s commitment to the highest standards of integrity and ethical conduct and any disciplinary policies that impose consequences for code of conduct and other policy violations;

- A University policy on reporting suspected fraud and fiscal irregularities (see University Prevention and Reporting of Fraud and Fiscal Irregularities policy);

- A written summary of the Federal False Claims Act, federal whistleblower protections and the federal administrative remedies for violations of the Federal False Claims Act (see Appendix A);

- A written summary of state civil and criminal penalties for false claims along with the whistleblower protections afforded under such laws (see Appendix A);
• Written policies and procedures for investigating known or suspected compliance concerns including allegations regarding fraud, waste or abuse; and

• Written policies and procedures prohibiting retaliation against individuals who, in good faith, participate in investigations or report alleged violations of applicable policies, laws, rules or regulations.

D. SCOPE :
This policy applies to all UConn Health employees and to applicable contractors and agents of UConn Health.

E. PROCEDURE :
For reporting obligations, please see University policy - Prevention and Reporting of Fraud and Fiscal Irregularities

F. ATTACHMENTS :
APPENDIX A (Summary of Federal and Connecticut False Claims Laws and Other Connecticut Laws Related to Health Care Fraud). Link to Appendix A

G. STAKEHOLDER(S) :
1. Chief Executive Officer, Executive Vice President for Health Affairs
2. Chief Counsel
3. Compliance Officer

H. REFERENCES :
University of Connecticut Code of Conduct
University Policy: Prevention and Reporting of Fraud and Fiscal Irregularities
University Policy: Non-retaliation
UConn Health Policy # 2002-40: Payment Error Protection-Medicare Reimbursement
UConn Health Policy # 2003-33: Reporting Compliance Concerns
UConn Health Policy # 2003-35: Compliance Expectations and Goals
UConn Health Policy # 2003-40: Non-Retaliation
UConn Health Policy # 2006-03: Billing for Professional Services
UConn Health Policy # 2006-04: Refiling of Claims
UConn Health Policy # 2007-12: Overpayments from Healthcare Insurance Programs – Management of Systemic and/or Substantial Overpayments

31 U.S.C. §§ 3729, et. seq. (Federal False Claims Act)
31 U.S.C. §§ 3801, et. seq. (Federal Program Civil Remedies Act)

Connecticut General Statutes:
• §§ 4-274 et. seq.; (Connecticut False Claims Act)
• §§ 53a-290 et. seq. (Vendor fraud)
• §§ 53-440 et. seq. (Health insurance fraud)
• §§ 53a-118 et. seq. (Larceny)
• § 53a-155 (Tampering with or fabricating physical evidence)
• § 53a-157b (False statement intending to mislead public servant)
• § 17b-25a (Toll-free vendor fraud telephone hotline)
• § 17b-102 (Financial incentive for reporting vendor fraud)
• § 17b-99 (Vendor fraud penalties)
• § 4-61dd: Whistleblowing
<table>
<thead>
<tr>
<th>I. SEARCH WORDS:</th>
<th>Deficit Reduction Act; DRA; false claims; fraud; waste; abuse; whistleblower; compliance.</th>
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<td>J. ENFORCEMENT:</td>
<td>Violations of this policy may result in appropriate disciplinary measures in accordance with University By-Laws, General Rules of Conduct for All University Employees, applicable collective bargaining agreements, the University of Connecticut Student Code, other applicable University Policies, or as outlined in the procedures document related to this policy.</td>
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| K. APPROVED BY :| 1. Andrew Agwunobi (Signed) 8/2/18  
UConn Health Chief Executive Officer Date  
2. Carolle Andrews (Signed) 7/30/18  
Policy Committee Co-Chair Date  
3. Kiki Nissen (Signed) 7/31/18  
Policy Committee Co-Chair Date  |
| L. REVISION HISTORY: | New Policy Approved: July 9, 2018  |

[END OF POLICY]