

FRAUD, WASTE AND ABUSE

POLICY

Metro Support Services, Inc. (MSS) in partnership with North Metro Community Services, Inc. is committed to compliance with federal and state requirements under the Deficit Reduction Act of 2005. Specifically North Metro is committed to the deterrence, detection, appropriate reporting and correction of wrongdoing, misconduct, dishonesty, fraud, waste and abuse. Examples of such activity include but are not limited to:

- Billing for Services not rendered
- Billing for undocumented services
- Billing for medically unnecessary services
- Assigning incorrect codes to secure higher reimbursement
- Participating in Kickbacks
- Forgery, theft and intentional misrepresentation

It is the responsibility of every MSS Contractor as well as their employees to immediately report suspected or observed wrongdoing, misconduct, fraud, waste or abuse to the Executive Director of North Metro Community Services. If the Executive Director is suspected of such acts then the report shall be made to the President of the North Metro Community Services Board of Directors. If the Contractor or its employees are not comfortable making their report to North Metro Community Services they may instead choose to report to the Division for Intellectual and Developmental Disabilities at the State of Colorado or to the Colorado Department of Health Care Policy and Financing. When such cases are reported to North Metro Community Services it shall be the responsibility of the Executive Director or the Board President to see that all such reports are investigated appropriately.

Violations of this policy may have serve consequences including but not limited to civil and criminal penalties as allowed under applicable federal and state laws including the federal False Claims Act.

Retaliation against a person reporting wrongdoing, misconduct, fraud, waste or abuse is strictly prohibited by the DRA of 2005. In addition individuals making such reports may be afforded whistleblower protection under other Federal or State Laws.