

DRA COMPLIANCE POLICY AND PROCEDURE

The Federal Deficit Reduction Act of 2005, section 6032

The Deficit Reduction Act of 2005 (DRA), effective January 1, 2007, requires all entities that receive \$5 million or more in annual Medicaid payments to establish written policies that provide detailed information about the Federal False Claims act, the administrative remedies for false claims and statements, applicable state laws that provide civil or criminal penalties for making false claims and statements, the “whistleblower” protections afforded under such laws and the role of such laws in preventing and detecting fraud, waste and abuse in federal health care programs.

Under the DRA, MHR is required to disseminate these policies to its employees, contractors, agents or other persons who furnish, or otherwise authorize the furnishing of, health care items or services; perform billing or coding functions; or are involved in the monitoring of health care services provided by MHR.

MHR’s Compliance Activities

MHR’s Corporate Compliance Plan along with our policies and procedures, provide guidance in maintaining appropriate business and clinical practices. The documents are designated to help employees be aware of, understand and follow federal and state laws related to their jobs, and also to demonstrate MHR’s commitment to conducting business honestly and responsibly to the community at large.

- A ***Fraud and Abuse Law Policy*** outlines MHR’s detection and prevention of fraud, waste and abuse in the Medicaid program. This includes a summary of the Federal False Claims Act, federal whistleblower protections and the federal administrative remedies for Federal False Claims. To review the Federal False Claims Act, please select the following link:

<http://sharepoint/AgencyWideResources/Links/General%20Links/FEDERAL%20FALSE%20CLAIMS%20ACT.docx>

- All MHR employees must complete an annual training on MHR’s **Corporate Compliance Plan** and the **Fraud and Abuse Law Policy**. This training includes information on the Federal False Claims Act, applicable state false claims laws including civil or criminal penalties for making false claims and statements, the “whistleblower” protections afforded under such laws and the role of such laws in preventing and detecting fraud, waste and abuse. To review the Compliance Handbook and the Fraud and Abuse Law Policy and Procedure, please select the following links:

<http://sharepoint/Lists/All%20Staff/Attachments/1701/MHR%20Corporate%20Compliance%20Plan%208-26-10.docx>

<http://sharepoint/AgencyWideResources/Links/General%20Links/Fraud%20and%20Abuse%20Policies%20and%20Procedures.doc>

- A summary of the Minnesota State False Claims Laws that identify state civil and criminal penalties for false claims and statement along with the whistleblower protections afforded under such laws. To review the summary, please select the following link:

https://www.revisor.mn.gov/statutes/?id=15C&view=chapter&year=2010&keyword_type=all

Copies of the *Federal False Claims Act*, the *Minnesota State False Claims Laws*, MHR's *Fraud and Abuse Program Policy* and MHR's *Corporate Compliance Plan* are available upon request by contacting the Corporate Compliance Officer.