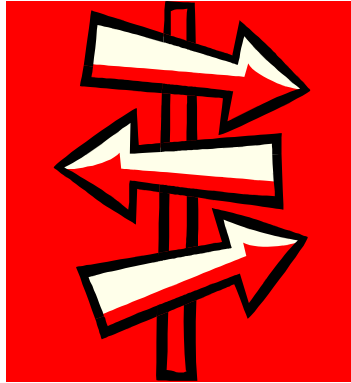


University of Louisville
Health Sciences Center
Office of Compliance
(Revised 1/1/07)



U of L Health Sciences Center Code of Ethical Conduct Related to Compliance

To further the University of Louisville's commitment for excellence and integrity, all employees of the Health Sciences Center, full-time and part-time, are expected to adhere to this Code of Ethical Conduct Related to Compliance (The Code) in their daily interactions with patients, colleagues, other health professionals, students, other trainees, and the public. These principles have been derived from federal, state, and local laws and regulations, University policies and procedures, and generally accepted principles of ethical conduct. This code of ethical conduct is not intended to dictate behavior. It does, however, establish minimum expectations which provide a disciplinary framework for staff who choose not to abide by these principles, and it serves to remind everyone of the University's commitment to the highest standards of ethical conduct.

All employees are expected:

- To become familiar with laws, regulations, and University Policies and foster compliance by following State and Federal laws and regulations and University policies related to their duties and responsibilities. We will strive to do it right the first time.
- To act in good faith, honesty, integrity, impartiality, and fairness in the way we conduct our activities on behalf of the University.
- To treat our colleagues as valuable members of the University team and treat them with fairness, respect and courtesy.
- To protect the confidentiality and security of University information such as patient records, student records, employee files, and contract negotiation documents as appropriate under all applicable laws.
- To manage conflicts between our personal interests and official responsibilities and to comply with University applicable codes and guidelines for reporting and reviewing actual and potential conflicts of interest and conflicts of commitment.
- To avoid engagement in any fraudulent activities, kickbacks or bribes intended to induce client referrals or admissions.
- To respect the rights and dignities of students, faculty, employees, patients and others who come into contact with the University
- To strive to attain the highest standards of patient care in furnishing medical and dental services responsive to the needs of patients, their families, and the communities in which the University functions
- To maintain professional competencies related to the performance of their job and strive to continually improve those competencies and quality of services, and discharge professional responsibility to the best of their ability.
- To report any practice or condition that may violate any laws, rules or regulations, safety standards, University policies, or The Code to appropriate management in a timely manner

University of Louisville Health Sciences Center Compliance Line

As one of Kentucky's Premier medical institutions, the University of Louisville recognizes the importance of fostering an atmosphere of integrity, honesty and morality. Our one mission is to improve the health and quality of life of the individuals and communities we serve. Only by working together as a team can we provide the best quality service to our patients and guests in a caring environment. The University of Louisville expects the highest ethical standards from everyone. If you become aware of a situation that may jeopardize the ethical integrity of our practices, it's up to you to report it. That's why we've instituted the U of L Compliance Line.

U of L's Compliance Line is a simple, risk-free way for you to report activities that may involve ethical violations or criminal conduct. The Compliance Line is managed and operated by an independent company hired by U of L's Office of Compliance to ensure that our compliance reporting is objective.

1-877-852-1167

Call anonymously, 24 hours a day, 7 days a week
To protect everyone involved, no disciplinary or legal action will be taken based solely on Compliance Line calls. Only substantiated findings will result in disciplinary action.

HSC Compliance Plan – CPP-006 – attachment B

The DRA, the False Claims Act, and You

This general overview of the False Claims Act is intended to help you understand about the Act and its relationship with the Medicare and Medicaid health care programs. Under the Deficit Reduction Act of 2005, any employer who receives more than \$5 million per year in Medicaid payments is required to provide information to its employees about the federal False Claims Act, any applicable state False Claims Act, and the rights of employees to be protected as whistle blowers, and the employer's policies and procedures for detecting and preventing fraud, waste, and abuse. We understand our employees work hard to ensure that we submit accurate and truthful patient claims, and this information will only help to facilitate this process.

The federal False Claims Act (31 USC 3729-33) makes it a crime for any person or organization to knowingly make a false record or file a false claim with the government for payment. "Knowingly" can be defined as: actual knowledge that the claim is false and/or deliberate ignorance or reckless disregard as to the truth or falsity of the claim. The Federal False Claim Act can be accessed at:

www.louisville.edu/medschool/compliance/

Examples of possible False Claims include someone knowingly billing Medicare for services that were not provided, or for services that were not ordered by a physician, or for services that were provided at sub-standard quality where the government would not pay.

A person who knows a False Claim was filed for payment can file a lawsuit in Federal Court on behalf of the government and, in some cases, receive a reward for bringing original information about a violation to the government's attention. Penalties for violating the Federal False Claims Act can be up to three times the value of the False Claim, plus from \$5,500 to \$11,000 in fines, per claim. Some states also have a False Claims Act that allows a similar lawsuit in state court if a False Claim is filed with the state for payment, such as under Medicaid or Workers' Compensation. Currently, Kentucky has

not enacted a False Claims Act. Indiana has a False Claims Act which does not meet the requirements of section 6031(b) of the DRA. The False Claims Act protects anyone who files a False Claim lawsuit from being fired, demoted, threatened or harassed by their employer for filing the suit. If a court finds that the employer retaliated, the court can order the employer to re-hire the employee, and to pay the employee twice the amount that is owed, plus interest and attorney's fees.

Our HSC Compliance Plan supports compliance with the False Claims Act by:

- Monitoring and auditing to prevent or detect errors in coding and/or billing.
- Educating our staff that they are responsible to report any concern about wrongdoing.
- Investigating all reported concerns and correct any billing errors discovered.
- Protecting our staff members from adverse action when they do the right thing a report any genuine concern. HSC Compliance Plan, CPP-006, attachment B, Non-Retaliation/Non-Retribution Policy.
- Policies and Procedures to set standards for the proper coding and billing of patient claims.

ATTESTATION

The University requires all employees to sign an attestation confirming they have received a copy of The Code, and have read and understand that it represents policies of the University and agree to abide by it. Please fill out the form, print and send by mail, interoffice mail or fax to the following address:

University of Louisville
Health Sciences Center
Office of Compliance
Med Center One; 501 East Broadway; #330; Louisville, KY 40202
Phone: 502-852-2993
Fax: 502-852-8013
www.louisville.edu/medschool/compliance/

I, _____, (please print)

attest that I have received the University of Louisville's HSC Code of Ethical Conduct Related to Compliance, and understand it represents policies of the University and agree to abide by it.

Signature: _____

Title: _____

Department: _____

Division: _____

Date: _____