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**Corporate Compliance – Response and Corrective Action AD.CC65**

**POLICY:**

Reports of potential wrongdoing or suspected fraud and abuse are thoroughly investigated, documented, and, if appropriate, reported to Federal or State authorities. If warranted, immediate corrective action is applied to prevent further occurrences.

**PROCEDURE:**

1. Reports of potential wrongdoing or suspected fraud and abuse receive an immediate response.
2. If wrongdoing is substantiated, Lifesong Hospice and Palliative Care, under the direction of legal counsel (if warranted), will report the wrongdoing to Federal and/or State authorities.
3. When wrongdoing is discovered, immediate steps are taken to determine causes and to prevent future occurrences.

***Overpayments***

4. An overpayment is identified when, through the exercise of reasonable diligence, the hospice has or should have determined that an overpayment has been received and quantified the amount of the overpayment.
5. An overpayment must be reported and returned by the later of:
  - a. The date which is 60 days after the date on which the overpayment was identified; or
  - b. The date any corresponding cost report is due, if applicable.
6. Overpayments are reported and returned if they are identified within 6 years of the date the overpayment was received.
7. An applicable claims adjustment, credit balance, self-reported refund or other appropriate process is used to satisfy the obligation to report and return overpayments.
8. When necessary or appropriate, legal counsel is consulted to assist with managing the process of reporting and refunding overpayments.

<b>Created:</b>	<b>Reviewed:</b>	<b>Revised:</b>	<b>Effective:</b>
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