



## ADMINISTRATIVE PROCEDURE

### EDUCATION REGARDING FALSE CLAIMS RECOVERY- MEDICAID REIMBURSEMENT PROGRAM

3703

Procedure No.

March 26, 2008

Date

- I. **PURPOSE:** To comply with Section 6032 (Employee Education About False Claims Recovery) of the Deficit Reduction Act of 2005 (DRA) in relation to the Prince George's County Public Schools (PGCPS) Medicaid Reimbursement Program.
- II. **BACKGROUND:** Section 6032 of the DRA requires providers that make or receive annual Medicaid payments of five million dollars or more during a federal fiscal year (October 1 to September 30) to educate employees and certain agents and contractors about federal and state false claims laws and whistle blowing protections available under those laws. A summary of relevant laws, including the federal False Claims Act (FCA), is contained in the Attachment. In general, these laws serve to detect and prevent waste, fraud and/or abuse in the administration of federal health care programs.
- III. **DEFINITION:** For the purpose of this Administrative Procedure, a “contractor” or “agent” includes any contractor, subcontractor, agent or other person which or who, on behalf of PGCPS, furnishes or otherwise authorizes the furnishing of Medicaid health care items or services, performs billing or coding functions or is involved in monitoring of health care provided by PGCPS. This definition includes supply vendors that provide products used in the furnishing of Medicaid health care services.
- IV. **PROCEDURES:**
- A. **Filing an Internal Report**
1. Any PGCPS employee, agent, or contractor who knows or reasonably believes that PGCPS or any of its employees, agents, or contractors is involved in any activity prohibited by the FCA, any state law, or other fraud and/or abuse law, is required to immediately report such belief by calling the PGCPS Compliance Hotline using the toll-free number, 1-866-646-2512, or by making an online report at the PGCPS website.  
<http://www.pgcpshotline.com/>
  2. Upon receipt of the report, the Office of Internal Audit will conduct an investigation into the matter, and will issue a written report summarizing its findings.



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3. If a finding of waste, fraud, or abuse is substantiated, PGCPs will report the finding to appropriate law enforcement and/or designated agencies responsible for enforcement of the applicable statutes.
- B. PGCPs will not tolerate any intimidating or retaliatory act against an individual who, in good faith, makes a report of practices reasonably believed to be a violation of the FCA or other applicable law. These individuals will be entitled to any and all protections available under applicable laws.
- V. **RELATED PROCEDURES:** None. This is a new Administrative Procedure.
- VI. **MAINTENANCE AND UPDATE OF THESE PROCEDURES:** These procedures originate with the Office of the Chief Financial Officer and will be updated as needed.
- VII. **CANCELLATIONS AND SUPERSEDES:** None. This is a new Administrative Procedure.
- VIII. **EFFECTIVE DATE:** March 26, 2008.

Approved by:  
John E. Deasy  
Superintendent of Schools

Attachment: Laws Relating to Filing False Claims

Distribution: Lists 1, 2, 3, 4, 5, 6, 9, 10, and 11