

***July 29, 2021***

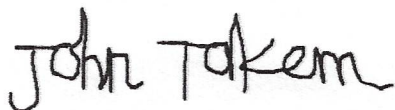
***Good day Dedicated Care Team:***

As Dedicated Care Health Services continues to provide great quality care to the people we serve, we continue to equally emphasize the need for staff to avoid engaging in fraudulent activities. Therefore, **effective immediately**, all staff of Dedicated Care Health Services will be required to sign a form attesting that they completed a mandatory training offered by the agency on **Quality Clinical Documentation and Medicaid Fraud, Waste and Abuse**. (Please see attachment for the form).

**All staff (FT and contractors) are required to sign and submit the attached Acknowledgement Form to Human Resources with a copy to his/her supervisor no later than *Friday, August, 6, 2021*.**

To further support these efforts, Dedicated Care Health Services will use its existing training library to provide each of you with the **link below** to the virtual trainings for Clinical Documentation and Fraud, Waste and Abuse. Also, below you will find, which all of you should be familiar with, the definitions of Fraud, Waste and Abuse, which are presented in the Compliance and Privacy Training for all new hires.

Please see below and other attachments.

A handwritten signature in black ink that reads "John Takem". The signature is written in a cursive, slightly slanted style.

*John Takem*  
*Program Director*

## **Fraud, Waste and Abuse**

Defined by Centers for Medicare and Medicaid Services (CMS)  
federal agency that administers the nation's major healthcare programs  
including Medicare, Medicaid, and CHIP.

### **What is Fraud? (42 CFR 42 §455.2)**

Fraud is an **intentional deception or misrepresentation** made by a person with the knowledge that the deception could result in some unauthorized benefit to himself or some other person. It includes any act that constitutes fraud under applicable Federal or State law.

### **What is Waste? (42 CFR 42 §455.2)**

Waste means over-utilization of services, or practices that result in **unnecessary costs**. Waste also refers to useless consumption or expenditure without adequate return, or an act or instance of wasting.

### **What is Abuse? (42 CFR 42 §455.2)**

Abuse describes provider practices that are inconsistent with sound fiscal, business, or medical practices, and result in: An unnecessary cost to the:

1. Medicaid and Medicare program;
2. Reimbursement for services that are not medically necessary; or,
3. Services that fail to meet professionally recognized standards for health care.

**Note: Abuse is similar to fraud, except that there is no requirement to prove or demonstrate that abusive acts were committed knowingly, willfully and intentionally.**



## DEDICATED CARE HEALTH SERVICES, INC. -

### ***Has Zero Tolerance for Fraud, Waste and Abuse***

Submitting an encounter note for billing or clocking in for a service that never happened is illegal, unethical and dangerous!!

Fraud hurts the consumers and their families entrusted in our care. Fraud has NEVER been and will **NOT** be tolerated at Dedicated Care Health Services, in any Shape or Form.

There are dire consequences when staff engage in fraud, including the following:

- a) You might contribute to someone's decline in health or death because you were not there to ensure that he or she received needed services, especially now more than ever with COVID and the surge of overdoses.
- b) It is an embarrassment and a blemish to the profession and makes all staff who are providing direct services and doing great work for our consumers potential fraud suspects because of the actions of a few.
- c) If fraud is substantiated, including billing on a deceased person or clocking in for services not rendered and not showing up for work, will not only affect you, it will severely impact the agency negatively.
- d) You will be contributing to the health care inequities in this country, where the most vulnerable citizens are already suffering excessively due to the impact of systemic racism, including inequities in good health care services. By not seeing or talking with that person and making up services with fraudulent notes, you are taking advantage of vulnerable people and you become part of the problem.

Follow all regulations, policies, training, supervision etc., all of which are based on best practices that contribute to the health and wellness of the people we support.

**OUR GOAL IS ALWAYS TO DO WHAT IS RIGHT, ETHICAL AND LEGAL. WORK WITH THE TEAM TO ACCOMPLISH THIS GOAL!**

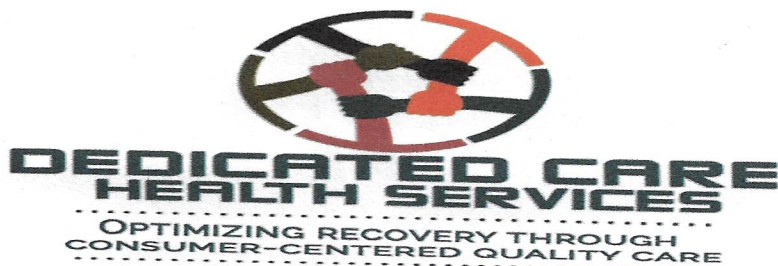
**MANAGEMENT**



***DEDICATED CARE HEALTH SERVICES HAS ZERO TOLERANCE FOR  
INDUCEMENT OF CONSUMERS***

- DEDICATED CARE HEALTH SERVICES DOES NOT PROVIDE INDUCEMENTS TO CONSUMERS.
- PROVIDING CONSUMERS WITH CASH OR IN-KIND INDUCEMENTS TO LURE THEM TO SERVICES IS UNETHICAL AND ILLEGAL.
- ANY STAFF THAT ENGAGES IN CONSUMER INDUCEMENTS WILL FACE SEVERE DISCIPLINARY AND LEGAL ACTION.

**MANAGEMENT**



## Acknowledgement of Completion of Training on Medicaid Fraud, Waste and Abuse

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I \_\_\_\_\_ have been trained and provided information on quality documentation standards and DCHS's zero tolerance for Medicaid fraud, waste and abuse. I understand that:

1. I must document my efforts to provide intervention and support to consumers timely and accurately, as the encounter occurred. I understand that notes will be reviewed to ensure documentation meets quality and compliance standards.
2. DCHS has zero tolerance for fraud, waste and abuse. I understand that there are serious consequences to staff, the agency and consumers and families when fraud occurs. I understand that my contract or employment with DCHS will be terminated, and I may face legal consequences/actions if I engage in Medicaid fraud, waste and abuse.

\_\_\_\_\_  
Staff Name

\_\_\_\_\_  
Date

\_\_\_\_\_  
Staff Signature

Supervisor Name: \_\_\_\_\_

Supervisor Signature \_\_\_\_\_ Date: \_\_\_\_\_