

# CHE LONG TERM CARE FACILITIES

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|---|---------------|
| SUBJECT: CALIFORNIA FALSE CLAIMS ACT (GOV. CODE §12650) | DEPT: POLICY: |
| SUBMITTED BY: <i>Rebecca Meins</i>                      | PAGE: 1 OF 2  |
| APPROVED BY: <i>Rebecca Meins</i>                       | DATE: 9/19/06 |

**PURPOSE:** It is the policy of this facility to comply with the requirements set forth in the California False Claims Act in an effort to prevent fraud against state and local governmental entities.

**POLICY:** All employees, agents and/or independent contractors of this facility must comply with the requirements set forth in the California False Claims Act. Under this Act, damages may be imposed on anyone who, among other things, knowingly presents or causes to be presented a false claim for payment or approval.

The following conduct is prohibited under the California False Claims Act:

- (1) Knowingly making false statements;
- (2) Falsifying records;
- (3) Double-billing for items or services;
- (4) Submitting bills for services never performed;
- (5) Submitting bills for items never furnished; and/or
- (6) Otherwise causing a false claim to be submitted.

It is the policy of this facility to inform all employees, agents and/or independent contractors that any person who commits such acts shall be liable to the state for damages which the state sustains because of the act of that person.

The Attorney General shall diligently investigate violations under the California False Claims Act and may bring a civil action against that person. A person may also bring a civil action for a violation of this Act and may be entitled to a percentage of the proceeds of the action or settlement of the claim.

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| SUBJECT: CALIFORNIA FALSE CLAIMS<br>ACT (GOV. CODE §12650) | DEPT:<br>POLICY: |
| SUBMITTED BY: <i>[Signature]</i>                           | PAGE: 2 OF 2     |
| APPROVED BY: <i>[Signature]</i>                            | DATE: 9/19/06    |

It is the policy of this facility to provide all employees, agents and/or independent contractors with detailed information about the California False Claims Act. A copy of the California False Claims Act (Gov. Code §§12650-12656) is located in the Human Resources Department.

## CHE LONG TERM CARE FACILITIES

SUBJECT: FEDERAL FALSE CLAIMS  
ACT (31 U.S.C. §3729)

DEPT:  
POLICY:

SUBMITTED BY:

*Rebecca Weiss*

PAGE:

1 OF 2

APPROVED BY:

*Rebecca Weiss*

DATE:

9/19/06

**PURPOSE:** It is the policy of this facility to comply with the requirements set forth in the Federal False Claims Act in an effort to prevent fraud against the Federal government. The Federal False Claims Act establishes liability for any person who knowingly presents or causes to be presented a false or fraudulent claim to the U.S. Government for payment.

**POLICY:** All employees, agents and/or independent contractors must comply with the requirements set forth in the Federal False Claims Act. Under this Act, a person or entity may be held liable to the U.S. Government for civil penalties if that person and/or entity engages in conduct which is not limited to the following:

- (1) Knowingly making false statements;
- (2) Falsifying records;
- (3) Double-billing for items or services;
- (4) Submitting bills for services never performed;
- (5) Submitting bills for items never furnished; and/or
- (6) Otherwise causing a false claim to be submitted.

It is the policy of this facility to inform all employees, agents and/or independent contractors that the Attorney General will investigate a violation under the Federal False Claims Act. If the Attorney General finds that an employee, agent and/or independent contractor has violated the Act, the Attorney General may bring a civil action under this section against the person.

If the Government proceeds with an action brought by an individual person, such person may receive a percentage of the proceeds of the action or settlement of the claim.


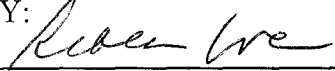
# CHE LONG TERM CARE FACILITIES

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| SUBJECT: FEDERAL FALSE CLAIMS<br>ACT (31 U.S.C. §3729) | DEPT:<br>POLICY: |
| SUBMITTED BY: <i>Robert W.</i>                         | PAGE: 2 OF 2     |
| APPROVED BY: <i>Robert W.</i>                          | DATE: 9/19/06    |

If the Government does not proceed with an action under this section, the person bringing the action or settling the claim may receive an amount which the court decides is reasonable for collecting the civil penalty and damages.

It is the policy of this facility to provide all employees, agents and/or independent contractors with detailed information about the Federal False Claims Act. A copy of the Federal False Claims Act (31 U.S.C. §§3729-3733) is located in the Human Resources Department.

## CHE LONG TERM CARE FACILITIES

|               |   |         |                         |
|---------------|---|---------|-------------------------|
| SUBJECT:      | EMPLOYER INTERFERENCE<br>WITH EMPLOYEE DISCLOSURE                                 | DEPT:   | CORPORATE<br>COMPLIANCE |
|               |   | POLICY: |                         |
| SUBMITTED BY: |  | PAGE:   | 1 OF 1                  |
| APPROVED BY:  |  | DATE:   | 9/19/06                 |

**PURPOSE:** To afford all employees protection in disclosing information pertaining to a false claim.

**POLICY:** CHE Long Term Care Facilities shall not make, adopt, or enforce any rule, regulation, or policy preventing an employee from disclosing information to a government or law enforcement agency or from acting in furtherance of a false claims action, including investigating, initiating, testifying, or assisting in an action filed or to be filed under Section 3729 of the United States Code or Section 12650 of the Government Code.

CHE Long Term Care Facilities shall not discharge, demote, suspend, threaten, harass, deny promotion to, or in any other manner discriminate against, an employee in the terms and conditions of employment because of lawful acts done by the employee on behalf of the employee or others in disclosing information to a government or law enforcement agency or in furthering a false claims action, including investigation for, initiation of, testimony for, or assistance in, an action filed or to be filed under Section 3729 et seq. of the United States Code or Section 12650 et seq. of the Government Code.