

Compliance Plan Definitions and Abbreviations

Abuse- Incidences or practices that are inconsistent with accepted sound medical, business, or fiscal practice.

Anti-Kickback Law- Prohibits the offer, solicitation, payment or receipt of anything of value to entice the referral of a patient for a service reimbursable under Medicare or Medicaid. Violators are subject to exclusion from the Medicare and Medicaid Programs.

Civil False Claims Act- The act mandates a penalty between \$5,000 and \$10,000 for each improper statement on the claim form plus three times the amount of damages suffered by the government.

Two medical schools and their faculty paid over \$50,000,000 in penalties due to actions brought by the Federal government. These penalties were related to fraud and abuse allegations for improper medical billings or due to undocumented or insufficiently documented patients' records.

DOJ- Department of Justice: The FBI and OIG refer investigative findings to this department, which may prosecute persons for violations of federal criminal laws.

FBI-Federal Bureau of Investigation: Investigate both Federal and private payer cases of fraud.

Fraud- An intentional deception or misrepresentation which the individual makes, knowing it to be false and that the deception could result in some unauthorized benefit to himself/herself or some other person.

GME- Graduate Medical Education: The Medicare program assumes some responsibility for graduate medical education costs by making separate payments to teaching hospitals for these costs.

HCFA- Health Care Financing Administration: An agency responsible for administering Medicare and Medicaid.

Medicaid- A national health insurance plan that is state controlled. It provides coverage for indigent families and the commercially uninsured.

Medicare Part B- A voluntary health insurance plan which pays for physician and outpatient services for the elderly/retired population, younger disabled individuals who are receiving social security benefits and persons who need dialysis or kidney transplants for treatment of end-stage kidney disease.

OIG- Office of Inspector General: One office responsible for investigation and prosecution of fraud. Also authorized to enforce civil monetary penalties and program exclusions on fraudulent providers.

Resident/Fellow/Intern: An individual who participates in an approved graduate medical education (GME) program or a physician who is not in an approved GME program but who is authorized to practice only in a hospital setting.

Stark-Law: Self Referral Prohibition: Provisions banning a physician from referring specimens to any entity with which the physician has a financial relationship.

Teaching Hospital: A hospital engaged in an approved GME program in medicine, osteopathy, dentistry, or podiatry.

Teaching Physician: A physician who involves residents in the care of his or her patients.

Whistleblower: Under the False Claims Act, any person with the knowledge of false claims or fraud against the government may bring a lawsuit in his or her own name and in the name of the United States.