



The Human Development Center, Inc. Policy & Procedure	Policy #205	
<input checked="" type="checkbox"/> Milw County <input checked="" type="checkbox"/> T19	Effective Date: 09/01/2009	Subject: FRAUDULENT ACTIVITY

I. POLICY

It is the policy of The Human Development Center, Inc to detect and prevent fraudulent and abusive activity and that allegations of fraudulent activity is thoroughly investigated and that corrective/legal measures/actions are appropriate. This policy applies to any fraud/abuse, or suspected fraud/abuse, involving service providers and youth/families.

If it is determined that a service provider has committed any fraudulent activity, service provider will be terminated immediately. Service provider's last paycheck will be determined until findings of any money need to be repaid to funding source. If money owed is larger than final paycheck, HDC has the right to garnish wages until full amount is satisfied.

II. DEFINITIONS

Fraud-involves an intentional deception or representation that a service provider either knows is false or does not believe to be true and is related to material fact and wrongful deception intended for personal or financial gain.

Examples-

1. Billing for unallowable services and/or activities.
2. Entering progress notes under a different service providers authorizations.
3. Alteration or falsification of documents (i.e. progress notes, time cards, signature logs, etc.).
4. Theft of any asset (money, property, etc.).
5. Authorizing or receiving compensation for goods not received, services not performed, or hours not worked.
6. Misrepresentation of fact(s).
7. Doing anything listed in provider's don'ts.
8. Double Billing.
9. Self note approval.

III. PREVENTION

1. Promoting integrity and ethical behavior when working with clients.
2. Attend all required trainings.
3. Retrieving signatures on service logs after all face-to-face contact and phone contact.
4. Not billing for services not listed in client POC's.
5. Not billing for services not rendered.
6. Altering signatures on signature logs.
7. Not billing for unallowable services.
8. Adhering to HDC's provider do's.
9. Meet with one client per session for one on one services.