

Fraud, Waste and Abuse Policy

I. Introduction

This Fraud, Waste and Abuse (FWA) Policy is established for DG3 North America, Inc. to comply with the Centers for Medicare & Medicaid Services (CMS) regulations and to ensure the ethical and responsible use of Medicare funds. We are committed to providing high-quality services to our Medicare beneficiaries while preventing fraud, waste, and abuse within our organization.

II. Definitions

- **Fraud:** An intentional deception or misrepresentation that is used to obtain payment from Medicare for services not rendered, or at a higher level than delivered.
- **Waste:** Practices that lead to unnecessary costs to the Medicare program, even if unintentional, such as inefficient billing practices or providing unnecessary services.
- **Abuse:** Exploiting loopholes or program rules to obtain payment for services that are not medically necessary or are of inferior quality.

III. Examples of FWA

- Submitting claims for services not provided to a beneficiary.
- Billing for a higher level of service than actually delivered.
- Waiving beneficiary co-pays or deductibles without proper justification.
- Offering or receiving kickbacks or incentives to beneficiaries or referral sources in exchange for business.
- Ordering medically unnecessary tests or procedures.
- Providing poor-quality care that does not meet professional standards.
- Falsifying medical records to justify services.

IV. Compliance Measures

- **Training:** We will train all employees handling relevant materials on FWA regulations and this policy on an annual basis, or more frequently as needed.
- **Compliance Officer:** We will designate a Compliance Officer responsible for overseeing the FWA compliance program and investigating suspected violations.
- **Reporting System:** We will establish a system for employees and beneficiaries to report suspected FWA activity confidentially. This system may include a dedicated hotline, email address, or reporting form.
- **Disciplinary Action:** We will maintain a written policy for disciplinary action against employees who violate this policy. This may include termination of employment.



V. Reporting

We encourage all employees and beneficiaries to report any suspected FWA activity. Reports can be made anonymously through the designated reporting system. We will not retaliate against any individual who reports suspected FWA activity in good faith.

VI. Consequences of FWA

Violations of this policy may result in disciplinary action, up to and including termination of employment. Additionally, violations of FWA regulations may lead to civil and criminal penalties, including exclusion from Medicare and Medicaid programs.

VII. Review and Updates

This policy will be reviewed and updated periodically to reflect any changes in Medicare regulations or internal practices.