

Fraud, Waste, and Abuse (FWA) Policy for Caregivers at ATRIO Home Health Care

1. Purpose

The purpose of this policy is to define, identify, and prevent fraud, waste, and abuse (FWA) in the provision of Personal Care Assistance (PCA) services and other healthcare services offered by **Atrio Home Health Care**. This policy aims to promote integrity, accountability, and transparency in delivering care to ensure compliance with applicable state and federal laws, including those enforced by the **Minnesota Department of Human Services (DHS)**.

2. Scope

This policy applies to all **Atrio Home Health Care** caregivers, including but not limited to Personal Care Assistants (PCAs), direct support professionals, and any other employees or contractors involved in providing services to clients. The policy addresses the reporting and prevention of fraud, waste, and abuse related to the delivery of services covered under PCA and other home health care programs.

3. Definitions

- **Fraud:** The intentional misrepresentation or concealment of facts with the intent to deceive or mislead, which results in financial or personal gain
- **Waste:** The inappropriate or inefficient use of resources, which may not involve intentional deception but can result in unnecessary costs.
- **Abuse:** The intentional or unintentional act of using care services in a manner inconsistent with accepted standards, or neglecting the proper care and well-being of clients. This includes failure to provide services,

4. Policy Statement

At **Atrio Home Health Care**,

- **Caregivers:** All caregivers must act ethically, provide services as documented, and comply with the policies set by **Atrio Home Health Care** and the **Minnesota DHS**. Caregivers are expected to promptly report any suspicions or observations of fraud, waste, or abuse, whether related to their own activities or those of others.

5. Reporting Fraud, Waste, and Abuse

All caregivers and employees of **Atrio Home Health Care** have a responsibility to report any suspected or observed instances of fraud, waste, or abuse. The following reporting procedures should be followed:

- **Internal Reporting:** Employees and caregivers should report concerns to their direct supervisor or to the designated **Compliance Officer/Manager** at Atrio Home Health Care.
- **Anonymous Reporting** and or / **External Reporting:**

8. Non-Retaliation

Atrio Home Health Care prohibits retaliation against any caregiver or employee who reports suspected fraud, waste, or abuse in good faith. This includes protection against disciplinary action, discharge, harassment, or any form of intimidation. All employees are encouraged to report concerns without fear of retaliation.

9. Investigations and Corrective Action

When an FWA issue is reported, **Atrio Home Health Care** will:

- Investigate the concern thoroughly and promptly.
- Take appropriate corrective action if fraud, waste, or abuse is confirmed.
- Cooperate fully with authorities, including DHS, Medicare, and law enforcement, if necessary.
- Employees found to be involved in fraudulent activities may face disciplinary actions, up to and including termination of employment and legal action.

10. Training and Education

All caregivers can go through extra training when and if needed. Training will cover:

- Definitions of fraud, waste, and abuse.
- Reporting mechanisms.
- The potential consequences of engaging in fraudulent, wasteful, or abusive practices.
- Relevant state and federal regulations (e.g., DHS, Medicare, Medicaid).

11. Compliance with Laws and Regulations

Caregivers and employees must comply with all applicable local, state, and federal laws, including the **Minnesota Department of Human Services (DHS)** regulations, **Medicare/Medicaid** requirements, and **PCA** program rules. Violations of these laws will not be tolerated.

12. Policy Review and Updates

This policy will be reviewed and updated regularly to ensure it aligns with changes in relevant laws and regulations. Employees will be notified of any updates or revisions.