Arion Care Solutions, LLC

1405 N. Dobson Rd., Ste 3 Chandler AZ 85224 PH: 480-722-1300 Fax: 480-422-3824

Arion Care Solutions LLC Anti-Fraud Policy:

It is Arion Care Solutions (ACS) policy to detect and prevent fraud in the delivery of services. Many federal and state laws are designed to prevent healthcare fraud. Some of these laws are intended to prevent any kickback or payment for referring patients, particularly in federally or state funded programs.

The corporate fraud policy is established to facilitate the development of controls that will aid in the detection and prevention of fraud against ACS. It is the intent of ACS to promote consistent organizational behavior by providing guidelines and assigning responsibility for the development of controls and conducting of investigations.

This policy applies to any irregularity, or suspected irregularity, involving employees, persons receiving services, guardians, consultants, vendors, contractors, outside agencies doing business with employees of such agencies, and/or any other parties with a business relationship with ACS.

Fraud is defined as the intentional, false representation or concealment of a fact for the purpose of inducing another to act upon it to his or her injury. Each employee of ACS will be familiar with the types of improprieties that might occur.

Any irregularity that is detected or suspected must be reported immediately to the Human Resources Department.

Penalties for violating anti-fraud laws include fines, criminal or civil actions or exclusion from the Medicare and AHCCCS programs or other federal programs and termination from employment.

It is the policy of ACS to take appropriate measures to detect and prevent potential noncompliance or errors. Accordingly, ACS and its staff members acknowledge the following in order to comply with ACS policy.

Actions Constituting Fraud

- Any dishonest or fraudulent act
- Submitting claims (known incorrect time sheets) for services that were not provided
- Falsely documenting and coding claims to reflect the services that were not provided
- Impropriety in the handling or reporting of money or financial transactions
- Making or offering payments or any other benefits to physicians or others for referrals of patients or the ordering of services
- Accepting payments or any other benefits from vendors or suppliers in return for additional business
- Participating in the destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment
- Disclosing confidential and proprietary information to outside parties

If there is any question as to whether an action constitutes fraud, Human Resources should be contacted.

If fraudulent activity is identified. ACS is responsible for the following:

- Correcting a bill that it learns is inaccurate
- Notifying payors of overpayments for services and refunding overpayments, as applicable
- ACS will cooperate with authorized investigators seeking information about potential billing or fraud concerns
- ACS will not retaliate against someone who, in good faith, makes a complaint or participates in the investigation of a complaint concerning false or fraudulent statement or claims of payment

If an investigation results in fraudulent activity being conducted by an employee, the employee will be terminated.

How to Report a Compliance Concern:

If you have compliance concerns or questions regarding ACS, you may:

- Call the Human Resource Department at 480-722-1300. The Human Resource Department is located at 1405 N Dobson Rd Suite 3 Chandler AZ 85224.
- Alternatively, you may submit a written concern to the Human Resource Department. The Human Resource Department will respond promptly to all compliance calls and reports. Compliance calls and reports will be treated confidentially, to the extent permitted by law, unless you agree otherwise. You can make an anonymous call or report, although it is sometimes harder for the Compliance Department to investigate concerns without being able to contact you for follow-up information.