

January 1, 2014

TO: Callen-Lorde Community Health Center's Vendors, Agents, and Contractors

FROM: Dawn Page, Corporate Compliance Officer

RE: **FALSE CLAIMS POLICY**

Dear Vendor/Agent/Contractor:

Under the Deficit Reduction Act of 2005, Callen-Lorde Community Health Center is required to provide information to all employees and contractors about: (1) the Federal False Claims Act and similar New York laws; (2) the rights of employees, and others to be protected as whistleblowers; and (3) our policies and procedures for detecting and preventing fraud, waste, and abuse.

In general, a false claims act (whether federal or state) is a statute designed to protect government funds and establish liability for any person who knowingly presents a false claim to the government for payment. If a healthcare provider submits a false claim, the provider may face penalties and exclusion from participation in federal and state healthcare programs. To encourage individuals to come forward and report misconduct involving false claims, whistleblower provisions are included which allow a person who meets certain criteria and with actual knowledge of false claims to file a lawsuit on behalf of the government.

Callen-Lorde Community Health Center has a Corporate Compliance Plan and False Claims Policy which provide mechanisms for detecting and preventing fraud, waste, and abuse. It is expected that anyone with a concern about a possible false claim involving Callen-Lorde Community Health Center will report it immediately to the Corporate Compliance Officer so that we can investigate and rectify mistakes. All individuals are protected from retaliation for making a good faith report.

The False Claims Policy and Corporate Compliance Plan can be found on the Callen-Lorde Community Health Center website

If you have any questions or concerns regarding this policy or any compliance issue, please contact:

Dawn Page, RN, BSN, CPHQ  
Corporate Compliance Officer  
Callen-Lorde Community Health Center  
356 West 18<sup>th</sup> Street, NY, NY 10011  
212-271-7230  
dpage@callen-lorde.org