

To: OSF Vendors Attn: Human Resources/Compliance Departments From: John R. Evancho, Senior Vice-President, Chief Compliance Officer Re: Deficit Reduction Act of 2005

The Deficit Reduction Act (DRA) of 2005 states that health care providers receiving \$5 million dollars of aggregate Medicaid payments annually must establish and disseminate certain written policies and procedures to its contractors or agents, who must then abide by the polices as to the work the contractor or agent performs for the entity, in addition to making the policies available to the contractor's and agent's employees involved in performing that work. The written policies and procedures must discuss the False Claims Act, administrative remedies for false claims and statements, State laws pertaining to civil and criminal penalties for false claims and statements, and whistleblower protections under these laws as well as the role of these laws in preventing and detecting fraud, waste and abuse.

For purposes of the DRA, <u>contractors or agents include those providing billing and coding functions, and those</u> which or who, on behalf of the entity, furnish or otherwise authorize the furnishing of Medicaid health care items or services or are involved in the monitoring of health care provided by the entity. This includes, but is not limited to: all contract therapists, physicians (including, but not limited to, house staff, hospitalists, and independent contractors), and pharmacies. <u>Supply vendors that supply products used in the furnishing of</u> <u>Medicaid health care services are also considered an entity's contractor.</u>

Your or your organization's name appeared on our vendor payee records. These records do not provide information about the nature of the services or products you provided to OSF Healthcare. If those services or products do not constitute services underlined above, please disregard this letter.

The OSF Policy "False Claims Prevention and Whistleblower Protections" can be accessed in the Vendor Information section of our website at <u>https://www.osfhealthcare.org/compliance/</u>. We are requesting that you provide this information to all employees of your organization who have jobs and duties related to any and all facilities of OSF HealthCare System which includes:

- OSF Holy Family Medical Center OSF Saint Anthony Medical Center OSF Saint Anthony's Health Center OSF Saint Elizabeth Medical Center OSF Saint Francis Medical Center OSF Saint James-John W. Albrecht Medical Center OSF Saint Luke Medical Center OSF Saint Paul Medical Center OSF St. Francis Hospital and Medical Group OSF St. Joseph Medical Center OSF St. Mary Medical Center OSF Home Care Services OSF Medical Group
- Monmouth, Illinois Rockford, Illinois Alton, Illinois Ottawa, Illinois Peoria, Illinois Pontiac, Illinois Kewanee, Illinois Mendota, Illinois Escanaba, Michigan Bloomington, Illinois Galesburg, Illinois Illinois and Michigan Illinois and Michigan

Please direct any questions or requests for a paper copy of the policy to Gail Sheehan, Compliance Officer at 309-308-5967 or <u>Gail.S.Sheehan@osfhealthcare.org</u>.

Thank you for your attention to this matter.