



January 15, 2007

To: Saint Luke's Health System Vendor

From: Sally Thieman, V.P. Corporate Compliance

Re: False Claims Policy

Dear Vendor:

Under the Deficit Reduction Act of 2005, Saint Luke's Health System is required to provide information to all employees and contractors about the Federal False Claims Act, similar Missouri and Kansas laws, the rights of employees and others to be protected as whistleblowers, and our policies and procedures for detecting and preventing fraud, waste, and abuse.

In general, a false claims act (whether state or federal) 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.

Saint Luke's Health System has a Corporate Compliance Program 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 a Saint Luke's Health System entity will report it immediately to the 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 System website at www.saintlukeshealthsystem.org, in the bottom right hand corner under the "Compliance and Privacy" link. Please distribute this letter to all of your employees and agents who provide services to, for or on behalf of a Saint Luke's Health System entity.

If you have any questions or concerns regarding this policy or any compliance issue, please contact me at 816-932-3218 or Krista Brungardt at 816-932-6858. You may also call the Compliance Hotline at 816-932-3053 and someone from the Corporate Compliance Office will contact you to discuss your concern.