

Embezzlement

How to Understand and Avoid This White Collar Crime: *Training for Health Care Organizations*



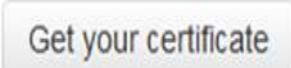
Study Guide

Provided by the American Institute of Healthcare Compliance (AIHC)

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INSTRUCTIONS

You have access to this training for 90 days from the date of registration. If your employer registered you, please check with them regarding date requirements for completion.

- ▶ STEP 1: Review the information in the Study Guide prior to attempting the Online Embezzlement Quiz.
- ▶ STEP 2: To access the quiz go to www.aihc-assn.org/exams and enter your Username and Password. Click on *My courses*, then *Embezzlement-Understanding and Avoiding this White Collar Crime Training*, then  [Online Embezzlement Quiz](#) You need a minimum score of 80% to pass.
- ▶ STEP 3: If you do not pass the quiz on your first attempt, review the study guide and retake the quiz.
- ▶ STEP 4: Once you have successfully completed the quiz click on  [Completion Certificate](#) then,  and print your certificate for your employer.

What is White Collar Crime?

- ▶ Embezzlement is considered a “White Collar Crime”.
- ▶ White-collar crime generally encompasses a variety of nonviolent crimes usually committed in commercial situations for financial gain.

What is White Collar Crime?

The following is an inclusive list of white-collar offenses:

- ▶ antitrust violations, bankruptcy fraud, bribery, computer and internet fraud, counterfeiting, credit card fraud, economic espionage and trade secret theft, embezzlement, environmental law violations, financial institution fraud, government fraud, healthcare fraud, insider trading, insurance fraud, intellectual property theft/piracy, kickbacks, mail fraud, money laundering, securities fraud, tax evasion, phone and telemarketing fraud, and public corruption.

What is White Collar Crime?

- ▶ ***According to CNBC News***, the white-collar crime of embezzlement is costing U.S. businesses \$50 billion a year! Some estimates indicate that more than \$400 billion is stolen annually by employees in the United States.
- ▶ ***According to the Federal Bureau of Investigation (FBI)***, white-collar crime is estimated to cost the United States more than \$500 billion annually. Although typically the government charges individuals for white-collar crimes, the government has the power to sanction corporations as well for these offenses.

What is White Collar Crime?

- ▶ The penalties for white-collar offenses include fines, home detention, community confinement, paying the cost of prosecution, forfeitures, restitution, supervised release, and imprisonment.
- ▶ Federal Sentencing Guidelines suggest longer prison sentence whenever at least one victim suffered substantial financial harm.
- ▶ Sanctions can be lessened if the defendant takes responsibility for the crime and assists the authorities in their investigation.

What is White Collar Crime?

- ▶ Both state and federal legislation enumerate the activities that constitute white-collar criminal offenses.
- ▶ The Commerce Clause of the U.S. Constitution gives the federal government the authority to regulate white-collar crime.
- ▶ A number of federal agencies, including the FBI, the Internal Revenue Service (IRS), and the Securities and Exchange Commission (SEC), participate in the enforcement of federal white-collar crime legislation.
- ▶ In addition, most states employ their own agencies to enforce white-collar crime laws at the state level.

What is White Collar Crime?

- ▶ Experience has shown that incidents of employee embezzlement are common regardless of a particular company's size or sophistication.
- ▶ It is particularly prevalent in the *health care industry*, regardless of the size of your organization.

Why Would Your Employee(s) Embezzle?

- ▶ Embezzlers aren't your typical criminals. Most are business professionals - front desk staff, registrars, medical billers, bookkeepers or office managers.
- ▶ Often they have no criminal history, not even parking tickets.
- ▶ Most embezzlers are women.
- ▶ The term pink-collar crime was popularized by Dr. Kathleen Daly during the 1980s to describe embezzlement type crimes that typically were committed by females based on limited opportunity.

Why Would Your Employee(s) Embezzle?

- ▶ In this context, women were more likely to have committed low-level crimes such as check kiting and book-keeping fraud from positions of less power compared to men who had engaged in acts of white-collar crime.
- ▶ A pink collar criminal can be a PTA mom, your dentist's office manager, and yes, even someone's grandma.
- ▶ According to the FBI, male embezzlers have increased only 4% since 1990 while pink collar criminals have increased over 40% during that time period.

Why Would Your Employee(s) Embezzle?

- ▶ Embezzlers, experts say, usually hide behind a smile, show a willingness to work long hours and have a trust built up over years of employment.
- ▶ In his 2011 book titled “Biting the Hand That Feeds: The Employee Theft Epidemic,” author Terry Shulman wrote “If employees seem too good to be true, often they are, because often it is the star employee who is led out in handcuffs.”
- ▶ What are the causes that lead someone to commit fraud in the workplace? There seem to be three major factors:
 1. Pressure
 2. Opportunity
 3. Rationalization.

Why Would Your Employee(s) Embezzle?

Pressure/Incentive

- ▶ The embezzler has to be under some type of financial pressure or incentive. It could be gambling, a drug or shopping addiction, or simply having taken on too much debt.
- ▶ It could also be that they are living a lifestyle beyond their means and accumulating material goods that they cannot afford.
- ▶ Then there are the employees seeking payback for an employer who is not treating them fairly or with respect.

Why Would Your Employee(s) Embezzle?

Opportunity

- ▶ The embezzler sees what they perceive to be an opportunity and one that they can exploit and keep secret.
- ▶ The key is to circumvent internal controls and develop a scheme to exploit them.
- ▶ Using others' identities without their knowledge on electronic banking cards was how one local county employee allegedly managed to steal up to \$1.5 million.
- ▶ The most common schemes involve creating false invoices or transactions, forgery, or unauthorized issuance of company checks.

Why Would Your Employee(s) Embezzle?

Rationalization

- ▶ Most people who commit fraud in the workplace have no criminal past and are first-time offenders.
- ▶ Despite stealing from their companies, they still believe themselves to be “honest and decent people.”
- ▶ As part of their denial, they find ways to justify (rationalize) their crimes to themselves.
- ▶ In a health care organization where staff may have inside information regarding the organization’s monthly or annual collections, we often find rationalization to be the underlying factor. These staff members seem to believe they work so hard and deserve a “cut” of the profits.

Recognizing Potential Embezzlement Schemes

- ▶ According to the [2017 Hiscox Embezzlement Study](#), funds theft is the most common embezzlement scheme, which accounts for 34.5% of all cases with 56% of cases being perpetrated by women.
- ▶ Check fraud came in second place, accounting for 22.1% of all cases.
- ▶ 29% of employee theft schemes went on for more than 5 years.
- ▶ Companies of any size are at risk for embezzlement but 68% of embezzlement cases occurred at companies with fewer than 500 employees.
- ▶ The median age for women embezzlers is 43, while the median age for men is 49. Let's take a closer look at some of the most common embezzlement schemes.

Recognizing Potential Embezzlement Schemes

Cash Embezzlement or Funds Theft

The most frequently identified examples involving cash are:

- ▶ Holding cash from a transaction instead of placing the cash in a cash container (e.g., register, vault or safe);
- ▶ Taking cash from an unsecured “petty cash” container;
- ▶ Taking cash from unsecured personal items left on the premises (e.g., wallet, purse, briefcase, backpack);
- ▶ “Short-changing” customers at the time of the transaction;
- ▶ Refunding stolen items for cash;
- ▶ Cashing stolen and forged documents for a confederate; and
- ▶ Theft of cash from another employee’s work area.

Recognizing Potential Embezzlement Schemes

Account Credit Embezzlement

The most frequently-identified examples involving account credits are:

- ▶ Activating and manipulating inactive or dormant accounts;
- ▶ Unauthorized transfers between general ledger accounts;
- ▶ Deposit accounts for fictitious persons or entities to receive stolen or forged checks;
- ▶ Deposit accounts for check kiting.

Recognizing Potential Embezzlement Schemes

Expense Reimbursement Fraud

- ▶ Employees may submit expense reports with expenses that either never occurred or are not related to a specific business event.
- ▶ Employers should require receipts for reimbursable expenses and question those that seem unusual or not related to a specific trip or project.
- ▶ Having an immediate supervisor review expense reports before they are submitted for payment can also help identify questionable expenditures.



Recognizing Potential Embezzlement Schemes

Payroll Fraud

Payroll fraud is the theft of cash from a business via the payroll processing system. There are several ways in which employees can commit payroll fraud:

▶ **Advances not paid back:**

- ▶ The most passive type of fraud is when an employee requests an advance on his pay and then never pays it back.
- ▶ This works well when the accounting staff does not record advances as assets (instead charging them directly to expense), or never monitors repayment.
- ▶ The non-payment of advances requires inactivity by the recipient and inadequate transaction recordation and follow-up by the accounting staff.
- ▶ A monthly procedure to review advances will eliminate this issue.

▶ **Buddy punching:**

- ▶ An employee arranges with his fellow employees to have them punch his hours into the company time clock while he takes the day off.
- ▶ Supervisory reviews and the threat of termination are the best ways to avoid this risk.
- ▶ A more expensive alternative is to use biometric time clocks, which uniquely identify each person who is signing into the time keeping system.

Recognizing Potential Embezzlement Schemes

Payroll Fraud

Payroll fraud is the theft of cash from a business via the payroll processing system. There are several ways in which employees can commit payroll fraud:

▶ **Ghost employees:**

- ▶ The payroll staff either creates a fake employee in the payroll records or prolongs the pay of an employee who has just left the company, and alters the payment record so that the direct deposit payment or paycheck is made out to them.
- ▶ This works best in large companies where supervisors have very large staffs and do not usually track compensation in sufficient detail.
- ▶ It also works well when a supervisor has left the company and has not yet been replaced, so that ghost employees can be inserted into their departments until a new supervisor is appointed.
- ▶ Periodic auditing of the payroll records is needed to spot ghost employees.
- ▶ Another way to spot a ghost employee is when there are no deductions from a paycheck, since the perpetrator wants to receive the maximum amount of cash.

▶ **Paycheck diversion:**

- ▶ Employees could take the paycheck of another employee who is absent, and then cash the check for themselves.
- ▶ This can be avoided by having the paymaster retain all unclaimed checks in a locked safe, and by requiring that everyone receiving a paycheck prove his identify with a driver's license or some similar document.

Recognizing Potential Embezzlement Schemes

Payroll Fraud

Payroll fraud is the theft of cash from a business via the payroll processing system. There are several ways in which employees can commit payroll fraud:

▶ Pay rate alteration:

- ▶ Employees collude with the payroll clerk to increase the amount of their hourly pay in the payroll system.
- ▶ A more clever clerk will then return the pay rate to its original level after committing this fraud for just a few pay periods, so that the issue is less easy to spot.
- ▶ This can be detected by matching pay rate authorization documents to the payroll register.

▶ Unauthorized hours:

- ▶ Perhaps the most common type of payroll fraud is the padding of time sheets by employees, usually in small enough increments to escape the notice of supervisors.
- ▶ This is a particular problem when supervisors are known to make only cursory reviews of time sheets.
- ▶ The best control over this type of fraud is the supervisory review.

Recognizing Potential Embezzlement Schemes

Check Kiting

- ▶ Check kiting is the deliberate issuance of a check for which there is not sufficient cash to pay the stated amount.
- ▶ The mechanics of this fraud scheme are:
 - ▶ Writing a check for which there is not sufficient cash in the payer's account.
 - ▶ Creating a checking account at a different bank.
 - ▶ Depositing the fraudulent check in the checking account that was just opened.
 - ▶ Withdrawing the funds from the new checking account.

Recognizing Potential Embezzlement Schemes

Check Kiting

- ▶ The entity harmed by check kiting is the bank that has allowed funds to be withdrawn from the new checking account without first waiting for funds to arrive from the paying bank.
- ▶ Banks combat this problem by not allowing funds to be withdrawn from an account until a certain number of days have passed, by which time the lack of funds in the payer's account will have been discovered.



Recognizing Potential Embezzlement Schemes

Check Kiting

There are a number of kiting indicators to look for, including:

- ▶ A large number of check deposits each day
- ▶ Many checks are drawn on the same bank
- ▶ A large proportion of cash in an account that has not yet cleared the paying bank
- ▶ Deposits are being made through multiple bank branches, in order to make the volume of deposits less obvious to the bank staff

Recognizing Potential Embezzlement Schemes

Check Kiting

- ▶ Check kiting is extremely intentional.
- ▶ Someone engaged in kiting has a detailed knowledge of how long it takes for checks to clear the bank, and will take advantage of the timing delay to withdraw cash (even partial amounts) just before the bank discovers that there is a problem.
- ▶ A sophisticated check kiting scheme can result in multi-million dollar losses.

Recognizing Potential Embezzlement Schemes

Credit Card Fraud

- ▶ This type of scheme includes fraudulent use, authorization, or creation of an employer's credit or debit cards.
- ▶ The company credit cards are then used for personal purchases, or unauthorized credit cards are issued.
- ▶ The financial secretary of a labor union had a union credit card that he used for personal expenses, including a family vacation to Bermuda.



Recognizing Potential Embezzlement Schemes

Vendor Invoicing, False Billing, and Over-Billing

- ▶ Be sure that all checks you sign are for legitimate vendors, not fictitious companies set up by a fraudulent employee.
- ▶ Invoices from vendors can be fabricated or inflated.
- ▶ In order for the fraud scheme to work, the employee creating the fabricated invoices is usually the person who can authorize the fictitious vendor company payments.
- ▶ Then the employee will deposit or cash the check in the fictitious vendor company's name.

Recognizing Potential Embezzlement Schemes

Vendor Invoicing, False Billing, and Over-Billing

- ▶ Over-billing is a method where the individual submits an inflated or altered invoice for payment.
- ▶ The overpayment is then diverted and paid to the employee or an accomplice.



Recognizing Potential Embezzlement Schemes

Merchandise or Property Theft

- ▶ The perpetrator steals property or merchandise belonging to the company. This may be the most underreported category of employee theft.
- ▶ An art handler stole \$600,000 worth of artwork from a New York dealer, which he then attempted to sell at a flea market.

Loan Fraud

An embezzler takes out a loan in the name of the business but diverts the proceeds to an account in their control.

Recognizing Potential Embezzlement Schemes

Lapping Scheme

- ▶ Lapping is a version of “robbing Peter to pay Paul” skimming. It is the extraction of money from one account to cover shortages in another account.
- ▶ For example, a fraudster steals the payment intended for customer A’s account. When a payment is received from customer B, the thief credits it to A’s account. And when customer C pays, that money is credited to B.
- ▶ Repeated many times, lapping is difficult for the dishonest employee to keep track of.
- ▶ Almost all lapping schemes quickly reveal themselves.

Recognizing Potential Embezzlement Schemes

Lapping Scheme

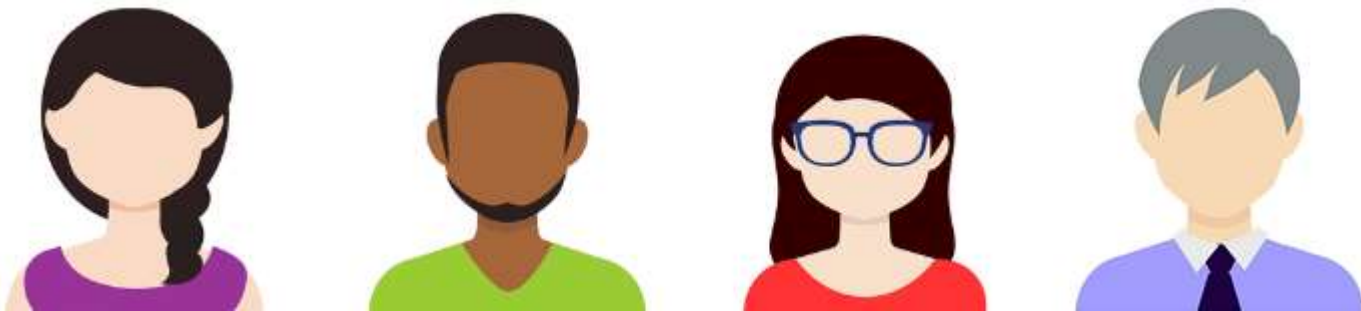
- ▶ Most lapping occurs because of inadequate control over incoming payments.
- ▶ Following are some classic “red flags” of lapping:
 - ▶ Excessive billing errors.
 - ▶ Slowing accounts receivable turnover.
 - ▶ Excessive write-offs of accounts receivable.
 - ▶ Delays in posting customer payments.
 - ▶ Accounts receivable detail doesn't agree with general ledger.
 - ▶ A trend of decreasing payments on accounts receivable.
 - ▶ Customer complaints.

Ways to Deter Embezzlement Schemes

- ▶ Internal controls start with segregation of duties
- ▶ Use of your bank's lock box
- ▶ Checks and balances
 - ▶ Tracking patient complaints of billing errors, delayed posting of payments
 - ▶ Tracking accounts receivable performance
 - ▶ Tracking adjustment codes posted, looking for excessive posting of adjustments which don't match the Remittance Advice or Explanation of Benefits
 - ▶ Tracking payment history and trends to look for an unexplained decrease in payments (from insurance or patients)
 - ▶ Tracking payroll reports to ensure wages paid are at the appropriate amounts

Ways to Deter Embezzlement Schemes

- ▶ Cross training and forcing employees to take time off
- ▶ Engaging your accounting firm to periodically conduct surprise audits of cash flow and cash management



What to Do When You Suspect Embezzlement

When an employer is first confronted with suspected embezzlement, the employer generally has four objectives:

1. To determine whether there was an actual theft;
2. To determine the total amount and method(s) of the theft;
3. To remove the wrongdoers from the workplace and take remedial actions to prevent such conduct and losses from occurring in the future; and
4. To recover the money or property lost.

What to Do When You Suspect Embezzlement

Conducting the Investigation

- ▶ It is rare for an embezzler to be caught by direct observation. More often, suspected embezzlement is first detected based on circumstantial evidence, such as another employee's report or through an audit.
- ▶ In such cases, the employer should move quickly to investigate and discipline the employees involved.
- ▶ Many times the complaint may first be filed to the Compliance Hotline or revealed during a routine internal audit of coding, documentation, billing and collection process.

What to Do When You Suspect Embezzlement

Conducting the Investigation

- ▶ The health care organization's Compliance Officer will become involved to ensure the investigation is conducted according to company policy, under the direction of legal counsel and in some cases, law enforcement.
- ▶ Once the complaint has been filed or incident revealed, one of the first things an employer should do is talk with those managers who are directly impacted by the loss or involved in the investigation and reinforce the need for privacy and confidentiality to the extent possible.
- ▶ The reason for this is twofold:
 - ▶ To avoid exposure to defamation claims; and
 - ▶ To avoid premature disclosure of information to the wrong party, especially when the employer may not yet know the extent of the wrongdoing, or who else may be involved.

What to Do When You Suspect Embezzlement

Conducting the Investigation

- ▶ The next step is to identify those employees (at every level of the company) who had both access and opportunity to commit the theft, as well as those who may have known of the theft but failed to disclose it.
- ▶ All employees with access and opportunity should be included in the investigation, regardless of their job record, length of employment, or stature within the company.
- ▶ Identifying such employees allows the employer to focus the investigation on as small a group of employees as possible with as little disclosure as possible.

What to Do When You Suspect Embezzlement

Conducting the Investigation

- ▶ Not only does this help maintain confidentiality but it also permits the employer to obtain statements before employees start talking with each other and comparing notes.
- ▶ If the loss is potentially large, or the theft appears complex, the employer should always seek the advice of legal counsel.
- ▶ In such cases, the employer also often should retain a forensic accountant, computer data retrieval specialists or other experts to assist in the investigation.

What to Do When You Suspect Embezzlement

Conducting the Investigation

- ▶ It may be appropriate for such experts to be hired by outside legal counsel both to maintain privilege in communications with these experts and to avoid any appearance of a conflict of interest.
- ▶ The use of outside legal counsel should help promote proper oversight and compliance with applicable securities laws and fiduciary obligations arising from embezzlement of material sums in publicly-held companies.

What to Do When You Suspect Embezzlement

Conducting the Investigation

During these early stages of investigating the alleged embezzlement, the employer is advised to contact its risk manager or insurance agent to determine its rights under any fidelity bond, crime loss or employee dishonesty insurance policies that it may have.

- ▶ Most policies require that a notice of claim be filed within a specified and sometimes relatively short time after discovery of a loss.
- ▶ For substantial losses, legal counsel should assist in evaluating the company's rights under its insurance policies to determine whether the loss is a covered loss under one or more of the policies and each policy's exclusions and deductibles.
- ▶ In order to avoid impairing any available insurance coverage, it is critical that the employer do nothing that would compromise an insurer's rights against a third party, including the wrongdoers. The insurer generally should be kept informed of the status and material developments in the investigation.

Make It Harder for Embezzlement to Go Undetected

Anti-Embezzlement Strategy Means Tightening Internal Controls

- ▶ Internal controls starts with segregation of duties which is also known as the separation of duties.
- ▶ The segregation of duties is the assignment of various steps in a process to different people.
- ▶ The intent behind doing so is to eliminate instances in which someone could engage in theft or other fraudulent activities by having an excessive amount of control over a process.
- ▶ This often happens when the provider entrusts all of the financial responsibilities to a seemingly loyal employee or manager.

Make It Harder for Embezzlement to Go Undetected

Anti-Embezzlement Strategy Means Tightening Internal Controls

- ▶ The segregation of duties is more difficult to accomplish in a smaller organization, where there are too few people to effectively shift tasks to different people.
- ▶ It doesn't happen only in smaller practices, but also in larger clinics or health care organizations where medical billing and collections is centralized to one location which may have limited staffing.

Make It Harder for Embezzlement to Go Undetected

Anti-Embezzlement Strategy Means Tightening Internal Controls

- ▶ Another issue with segregation is that shifting tasks among too many people makes the process flow less efficient.
- ▶ When a higher level of efficiency is desired, the usual trade-off is weaker control because the segregation of duties has been reduced.
- ▶ Where to start? There are two key concepts to consider when implementing a business system of good internal controls.

Make It Harder for Embezzlement to Go Undetected

Process Design with Segregation of Duties in Mind

- ▶ Each process should be designed to involve a separation of duties, and should have a designated control person.
- ▶ Separate performing duties to involve two different people in a way that causes them to verify each other's work as a result of the process itself.
- ▶ A control person is someone removed from the cash handling process and consequently available to be in charge of verification.

Make It Harder for Embezzlement to Go Undetected

Process Design with Segregation of Duties in Mind

For example:

- ▶ One employee would be entirely responsible for the cash drawer, including daily balancing and taking the deposit to the bank.
- ▶ Another employee is the control person who will receive patient encounter forms and receipts but does not have access to the cash drawer and does not take deposits to the bank.
- ▶ If there is a third employee who takes the money to the bank, that means another step is added to make sure the deposit amount is confirmed.

Make It Harder for Embezzlement to Go Undetected

Process Design with Segregation of Duties in Mind

- ▶ This separation of duties and control person approach should be applied to all activities vulnerable to theft.
- ▶ Appropriate controls to be implemented is different for each health care organization contingent upon size and organizational structure.
- ▶ Remember: Good internal controls are not a one-size-fits-all proposition.

Make It Harder for Embezzlement to Go Undetected

Process Design with Segregation of Duties in Mind

- ▶ Hopefully the examples above convey the most important concepts and provides guidance in establishing systems and processes that will work well for your organization.
- ▶ Your practice management consultant or CPA can be very helpful in evaluating your current processes and assisting with changes to make your internal controls stronger and embezzlement less likely.

Make It Harder for Embezzlement to Go Undetected

Review Monthly Reports

- ▶ **Cash balances** - Cash is critical for smooth operations.
- ▶ Available cash is what pays the staff and the bills. Ideally, you will keep one month or more in an operating account and have reserve accounts you can draw on.
- ▶ Comparing cash balances over time will reveal possible financial problems if cash is declining and also can serve as a potential “red flag” that funds may be missing, mismanaged, or being embezzled, unless this can be explained by unusual, one-time expenses or a decline in patient visits (due to seasonal trends or providers taking time off).

Make It Harder for Embezzlement to Go Undetected

Review Monthly Reports

- ▶ **Accounts receivable** - Hopefully, you are collecting co-pays and self-pays at the door, but it is inevitable that you will need to balance bill patients for co-insurance amounts, deductibles and carry accounts receivable for pending insurance payments.
- ▶ The critical report with accounts receivable is the aging, the reporting of how old those accounts are.

Make It Harder for Embezzlement to Go Undetected

Review Monthly Reports

- ▶ Review the aging report in addition to requesting specific reports on adjustment codes or write-offs.
- ▶ These detail the adjustments made to patient accounts, whether due to discounts, denials or adjustments.
- ▶ If there are a lot of denials or unexplained write-offs, your billing staff needs to focus on this area to improve approval rates and eliminate errors, or it can be an early sign of missing, mismanaged or embezzlement of funds.

Make It Harder for Embezzlement to Go Undetected

Even With Tight Controls, There is No Guarantee You Won't Be Embezzled

- ▶ Even with the very best controls in place, there is no way to absolutely protect or guarantee against embezzlement.
- ▶ This is even true in banking environments.



Make It Harder for Embezzlement to Go Undetected

Even With Tight Controls, There is No Guarantee You Won't Be Embezzled

Every health care organization and physician practice needs to take steps to prepare for theft.

- ▶ Conduct routine auditing and monitoring. Monitoring receivables and cash flow can deter or at least make it harder for employees to embezzle.
- ▶ Make wise hiring decisions. Conduct background checks, verify credentials and check references according to rules and regulations in your State.
- ▶ The employee handbook should make clear that embezzlement is grounds for immediate termination and prosecution.
- ▶ Carry a bonding policy to insure against it.

Is Your Organization “Inviting” Embezzlement?

- ▶ Health care auditors, executives and financial managers may not realize how creative an employee can be when given motive and opportunity to steal.
- ▶ Experts say that it is crucial for organizations (small and large) to understand that the person who is in charge of the money has to have a check and balance not controlled by them and that sole control of cash flow and banking should never be in the hands of one person.

Is Your Organization “Inviting” Embezzlement?

Conduct Periodic Audits

- ▶ If a routine financial audit reveals the possibility of foul-play, conduct an Internal Forensic Audit with a qualified team retained by your accounting or consulting firm.
- ▶ [Click Here](#) to learn more about Certified Internal Forensic Healthcare Auditor (CIFHA) training.
- ▶ We find that some doctors and health care organizations can be reluctant or unwilling to prosecute an employee caught stealing.
- ▶ That discomfort subsides a bit when the staff has been forewarned (in the policy) and even more so when the prosecution effort can be turned over and handled.

Pass the Online Quiz to Earn 1.5 CEUs

- ▶ To earn 1.5 CEUs, pass the 15 question online quiz with a score of 80% or better.
- ▶ You may retake the quiz over and over to achieve a passing score.
- ▶ Once you have achieved a passing score, your CEU certificate will become available to print from the quiz program.

