

# Connecticut

## **Addendum to Employee Standards and Code of Ethical Conduct Connecticut State False Claims Act**

This is a supplement to Trilogy's Employee Standards and Code of Ethical Conduct Handbook (Code) for employees who work in Connecticut. As stated in our Code, the federal False Claims Act and similar state laws assist the federal and state governments in combating fraud and recovering losses resulting from fraud in government programs, purchases, and/or contracts. These laws are very important laws that govern our business.

The Connecticut False Claims Act ("CFCA") and other Connecticut laws impose liability on any person who, with intent to defraud or deceive, makes, or causes to be made or assists in the preparation of any false statement, representation, or omission of a material fact in any claim or application for any payment, regardless of amount, knowing the same to be false.

### ***Connecticut False Claims Act (Conn. Gen. Stat. § 4-274)***

The liability and damages provisions under the CFCA are similar to those under the federal FCA. So, for example, an individual will be liable for knowingly presenting or causing the presentation of a false or fraudulent claim under a medical assistance program administered by the Department of Social Services, or knowingly making, using, or causing to be made or used a false claim under a medical assistance program administered by the Department of Social Services. Under the Connecticut False Claims Act, "[k]nowing' and 'knowingly' means that a person, with respect to information....[h]as actual knowledge of the information; ... acts in deliberate ignorance of the truth or falsity of the information; or ... acts in reckless disregard of the truth or falsity of the information, without regard to whether the person intends to defraud."

### ***Connecticut False Claims Act Penalties (Conn. Gen. Stat. § 4-275)***

The damages provision in the CFCA is similar to the statutory language of the federal FCA and allows for treble damages and civil penalties ranging from \$5,500 to \$11,000 per claim. The CFCA also makes a violator liable to the state for the cost of investigating and prosecuting the matter. In addition, the CFCA follows the federal statute by providing for the reduction of liability to not less than twice the amount of damages if the defendant voluntarily discloses the violations within thirty days of obtaining the information, if there is no criminal, civil, or administrative action yet taken on the violation, and if the defendant cooperates with the investigation.

### ***Connecticut False Claims Act Whistleblower Protections (Conn. Gen. Stat. § 4-284)***

The Connecticut False Claims Act prohibits employers from adopting or enforcing any policy that prevents an employee, contractor or agent from disclosing information to a government or law enforcement agency or from acting to further efforts to stop violations of the Connecticut False Claims Act.

## **Questions or Reporting:**

If you have questions about any of these requirements, you may contact Trilogy's Compliance Hotline at 1-800-908-8618 (extension 2800). This summary and others are also posted on Trilogy's external web site at [www.trilogyhs.com](http://www.trilogyhs.com), and Trilogy's intranet site under the Compliance home page.