

WHO HAS ULTIMATE RESPONSIBILITY FOR THE CORPORATE COMPLIANCE PROGRAM?

VillageCare's Board of Directors has ultimate responsibility for the Corporate Compliance Program and designates its Audit Committee to oversee all activities contained in the Corporate Compliance Program. The Corporate Compliance Officer is appointed by the Board of Directors to administer the day-to-day activities of the Corporate Compliance Program. A Corporate Compliance Committee is convened at the direction of the Corporate Compliance Officer to assist in carrying out these efforts. The Corporate Compliance Committee is comprised of key management, including the President & CEO and Executive Leadership who oversee clinical operations, plus provide support from areas including, but not limited to human resources, finance and information technology. As part of fulfilling the organization's compliance responsibilities, the Corporate Compliance Officer ensures that compliance inquiries and investigations are appropriately completed, ensures adequate training and internal audit and monitoring occurs, and makes appropriate reporting to the Corporate Compliance Committee, the President & Chief Executive Officer and the Board's Audit Committee.

WHERE CAN I ACCESS COMPLIANCE POLICIES & PROCEDURES AND THE CODE OF CONDUCT?

All compliance policies & Code of Conduct are maintained by the Compliance Office and accessible on the **VNET (Intranet)** and **VillageCare's website at www.villagecare.org/compliance**.

DO WE HAVE COMPLIANCE TRAINING?

Yes, everyone is required to complete training upon hire at orientation, annually; in addition to training received as part of the job.

HOW ARE COMPLIANCE ACTIVITIES MONITORED?

Continuous auditing and monitoring is performed that is overseen by the Corporate Compliance Officer and also performed by the Internal Audit division and includes the following areas:

- Billing, Revenue and Expenses
- Patient Rights and Services Provided
- Environment and Life Safety, Infection Control
- Information Privacy and Security
- Corporate Administrative/Legal Processes
- Exclusions, Sanctions, Provider Credentialing
- Others areas as necessary and includes reviews of purchasing practices, contracts, business associate agreements and employment related policies and procedures.

There are also other management level committees established to monitor compliance activities, implement corrective actions and review regular reports. These are known as:

- Corporate Quality Management Committee
- Professional Advisory Committees
- Performance/Quality Improvement Committees
- Security Incident Response Team

HOW IS OUR CORPORATE COMPLIANCE PROGRAM EVALUATED?

The Corporate Compliance Officer reports regularly on compliance activity throughout the organization to the Corporate Compliance Committee, the President & CEO and the Board of Directors which is designated to its Audit Committee. External reviews of the Corporate Compliance Program are also conducted periodically and in accordance with best practices.

CORPORATE COMPLIANCE PROGRAM

"Compliance is Everyone's Responsibility!"



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212-337-5637

www.villagecare.org/compliance

CORPORATE COMPLIANCE PROGRAM

VillageCare is a community based, not-for-profit organization serving people with chronic care needs, as well as seniors and individuals in need of continuing care and rehabilitation services.

The mission of VillageCare is to promote healing, better health and well-being to the fullest extent possible.

In 1999, VillageCare's Board of Directors formalized the Corporate Compliance Program and continues to demonstrate commitment to conducting business with integrity in compliance with all applicable rules and the state and federal laws and regulations that apply to the health care industry.

To reinforce commitment to our core values, VillageCare has implemented a Corporate Compliance Program to provide guidance for furnishing quality health care services to the community we serve in an ethical and lawful manner.

Quality care and ethical behavior are fundamental to the culture and practice at VillageCare. We are committed to acting with integrity in all activities and to treating our employees, patients, residents, members, medical providers, volunteers, interns, students and constituents in the community with respect.

VillageCare's Code of Conduct serves as a guide in matters concerning corporate compliance and ethical conduct.

WHAT ARE THE ELEMENTS OF THE CORPORATE COMPLIANCE PROGRAM?

The Corporate Compliance Program contains eight (8) key elements. These are:

- 1. Written Compliance policies and procedures, including standards of conduct.*
- 2. Designation of a Compliance Officer and Compliance Committee.*
- 3. Training and Education.*
- 4. Lines of Communication for Reporting Violations or Deficiencies.*
- 5. Internal Auditing and Monitoring and a procedure for assessing risks.*
- 6. Response to Detected Violations.*
- 7. Enforcement of Disciplinary Standards.*
- 8. Policy of Non-Retaliation for reporting.*

WHAT IS THE CODE OF CONDUCT?

The Code of Conduct is a guideline that sets forth VillageCare's commitment to good practices and ethical behavior. The Code of Conduct applies to everyone at all levels of the organization. The Code of Conduct is distributed at orientation and is reviewed as part of annual mandatory training.

HOW DO I MAKE AN INQUIRY OR REPORT A VIOLATION, INCLUDING HIPAA PRIVACY AND SECURITY ISSUES OR AN ACT OF FRAUD, WASTE AND ABUSE?

Representatives may report violations to any member of the management staff or their immediate chain of command.

Inquiries may also be submitted anonymously using the compliance hotline at this number:

COMPLIANCE HOTLINE
(877) 777-8221

WHAT HAPPENS AFTER A REPORT IS MADE?

The Corporate Compliance Officer initiates an investigation and ensures it is conducted promptly and thoroughly. Investigations may include the assistance of management, when needed, or legal counsel and/or other appropriate persons in a confidential manner.

Upon conclusion of an investigation, reports are issued and monitored to ensure that appropriate remediation and corrective action is undertaken, if needed.

Representatives shall not suffer retaliation for making a report in good faith.