



**Corporate Office**

120 Broadway, Suite 2840  
New York, New York 10271  
tel 212.337.5600  
www.villagecare.org

**David H. Sidwell**  
Chairman

**Emma DeVito**  
President & CEO

**FOR BETTER HEALTH AND WELL-BEING**

August 25, 2016

To Whom It May Concern:

VillageCare and its affiliated entities (see list of entities attached) are committed to providing the highest quality of care to our patients/residents/members/clients and conducting our business with integrity and in compliance with applicable federal and state laws and regulations. We have an extensive Corporate Compliance Program in place. We expect all employees and persons and entities with whom we do business to comply with all applicable policies and procedures of our Corporate Compliance Program.

As a participant in the Medicaid Program, we are obligated to comply with the terms and requirements of the Deficit Reduction Act of 2005 ("the DRA"). In accordance with the DRA, we have adopted written policies for our workforce that provide detailed information about the False Claims Act, the Program Fraud Civil Remedies Act, the relevant state laws, the whistleblower protections under such laws and VillageCare's policies for detecting and preventing fraud, waste and abuse.

The DRA also requires that we provide this information not only to our employees but to certain contractors and vendors that we do business with for their adoption. For your convenience and information, attached to this letter is a summary of our policy on fraud and abuse. We request that you familiarize yourself and your employees with this policy. The policy and the summary of laws prohibiting fraud and abuse can also be found on our website at:

[www.villagecare.org/compliance](http://www.villagecare.org/compliance)

VillageCare and its affiliated entities have a no-tolerance policy for employees, contractors and agents it does business with who are involved in any unlawful activity. We expect that you share our goals of eradicating fraud and abuse, and therefore, will comply with your obligations under the DRA. Any questions should be directed to VillageCare's Chief Compliance Officer, Dara Quinn, at (212) 337-5637.

Thank you for your attention and cooperation in this matter.

Very truly yours,

A handwritten signature in blue ink that reads "Emma DeVito".

**Emma DeVito**  
**President and Chief Executive Officer**

## **LIST OF VILLAGECARE AFFILIATED ENTITIES**

### **Village Center for Care:**

- o VillageCare Adult Day Health Care Program
- o VillageCare Wellness Innovations
- o VillageCare Health Home
- o VillageCare Rehabilitation and Nursing Center

### **Village Housing Development Fund Corporation:**

- o VillageCare at 46th & Ten

### **Village Care Senior Services Corporation:**

- o VillageCareMAX (Managed Long Term Care Plan)



### **POLICY IN FURTHERANCE OF THE DEFICIT REDUCTION ACT FRAUD AND ABUSE PROVISIONS**

VillageCare and its affiliated entities (“the organization”) are committed to complying with the requirements of Section 6032 of the Federal Deficit Reduction Act of 2005 and all other federal and state laws prohibiting fraud, waste and abuse in seeking reimbursement under the Medicaid and Medicare programs, and to preventing and detecting any fraud, waste, or abuse in the organization. To this end, the organization maintains a compliance program and strives to educate its work force on fraud and abuse laws, including the importance of submitting accurate claims and reports to the Federal and State governments. The organization’s compliance policies and procedures are set forth in detail in its compliance plan, and in the employee handbook provided to each employee.

The organization prohibits the submission, including any deemed knowing submission of a false claim for payment from a federally or state-funded health care program or insurer. Such a submission is a violation of Federal and State law and can result in significant administrative and civil penalties under the Federal False Claims Act, a Federal statute that allows private persons to help reduce fraud against the United States government.

The organization also prohibits the submission, including any deemed knowing

submission of a false claim for payment from a private person or payer.

In furtherance of this policy and to comply with the Deficit Reduction Act of 2005, the organization provides to employees, officers, directors, contractors and vendors the forgoing information about its policies and certain relevant Federal and State laws.