

Dear Vendor/Contractor/Physician/Service Provider:

It is the obligation of *CROSS KEYS VILLAGE - THE BRETHERN HOME COMMUNITY* to annually inform those with whom we do business of a variety of regulations and policies that require your attention. This letter is to inform you of those obligations and remind you that we encourage your feedback.

Compliance Program: *CROSS KEYS VILLAGE - THE BRETHERN HOME COMMUNITY* has a compliance program. A core document of any compliance program is the Code of Conduct which covers the compliance issues, laws and regulations and guidelines that are relevant to providers of senior services. This Code of Conduct is relevant to all individuals, including employees, contractors, volunteers, directors and officers.

We are providing you with a link to our [Code of Conduct](#), the full document can be viewed [on our website](#): www.crosskeysvillage.org. Please assure that you review your obligation to abide by our compliance program as a requirement of doing business with *Cross Keys Village – The Brethren Home Community*.

Any questions on our compliance program should be forwarded to:

Karla Dreisbach, Senior Compliance Officer
670 Sentry Parkway
Suite 120
Blue Bell, PA 19422-2325
215-646-0720

You are encouraged to communicate any compliance concerns to our compliance officer. If you or one of your staff members prefers to report a compliance concern anonymously, please use the Compliance Hot line. The compliance hot line phone is 1-800-211-2713.

Excluded Provider Policies: *CROSS KEYS VILLAGE - THE BRETHERN HOME COMMUNITY* cannot do business with any individuals or entities sanctioned by the Federal and State Government. It is your duty to inform us immediately if your organization or anyone under your employment is currently or becomes excluded in the future.

Any questions about exclusions should be forwarded to:

Kelley Mitchell
Vice President of Human Resources
Compliance Official
717-624-5245
k.mitchell@crosskeysvillage.org

Elder Justice Act: Under this regulation it is the obligation of anyone who works for, or contracts with a long term care community to report to local law enforcement, and to the Secretary of Health and Human Services, their reasonable suspicion of crimes committed against nursing home residents. This reporting must happen in a timely manner. If the events that cause

the suspicion—Result in serious bodily injury, the individual shall report the suspicion immediately, but not later than 2 hours after forming the suspicion; Do not result in serious bodily injury, the individual shall report the suspicion not later than 24 hours after forming the suspicion.

Please be sure to inform all of your employees who, in the course of business, are present on our community's campus, are aware of these obligations. Enclosed you will find a copy of our poster to share with your appropriate employees.

Deficit Reduction Act (DRA): *CROSS KEYS VILLAGE - THE BRETHERN HOME COMMUNITY* is committed to ethical, honest billing practices and expects every team member (including employee's independent contractors, subcontractors and vendors to be vigilant in maintaining these standards at all times. It is important that our contractors understand the provisions of a number of laws, your obligation to act under these laws and your right to report if you suspect a violation as well as protections available for those who report violations of these laws. Please ensure your staff are familiar with the below listed laws and regulations.

- Federal False Claims Act (31 U.S.C. §§ 3729-3733)
- Federal Civil and Criminal Penalties and Administrative Remedies
- False Claims Act Civil Penalties (31 U.S.C. § 3729)
- Program Fraud and Civil Remedies Act of 1986 ("PFCRA") (31 U.S.C. §§ 3801-3812)
- Civil Monetary Penalties Law ("CMPL") (42 U.S.C. § 1320a-7a)
- Criminal Penalties (42 U.S.C. § 1320a-7b)
- Exclusion from Participation in Federal Health Care Programs (42 U.S.C. § 1320a-7)
- State False Claims Laws
- Federal "Qui Tam" or "Whistleblower" Protections (31 U.S.C. § 3730)

If you have questions about billing practices please contact:

Crystal Brallier
Director of Billing and Reimbursement
717-624-5210
c.brallier@crosskeysvillage.org

Please contact us if you have any questions. We look forward to our continued partnership.

Sincerely,

Kelley Mitchell
Vice President Human Resources
Compliance Official