

July 28, 2021



Dear Vendor/Contractor/Physician/Service Provider:

It is the obligation of TIMBERCREST SENIOR LIVING 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: TIMBERCREST SENIOR LIVING 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.

Attached you will find a summary of our Code of Conduct, the full document can be viewed on our web site: [www.timbercrest.org](http://www.timbercrest.org). Please assure that you review your obligation to abide by our compliance program as a requirement of doing business with TIMBERCREST SENIOR LIVING COMMUNITY.

Any questions on our compliance program should be forwarded to: *Christy Huiras, COO*  
*chuiras@timbercrest.org*  
*260-982-2118*

You are encouraged to communicate any compliance concerns to our Compliance Officer or if you, or one of your staff members, prefer to report a compliance concern anonymously, please use the Compliance Hot line. The compliance hot line phone # is printed on the attached brochure.

Excluded Provider Policies: Timbercrest Senior Living 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: *Hilary Wagoner,*  
*hwagoner@timbercrest.org*  
*260-982-2118*

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 no later than 2 hours after forming the suspicion;
- ▶ do not result in serious bodily injury, the individual shall report the suspicion no 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.

If you have questions about billing practices please contact: *Yvonne Weston,*  
*yweston@timbercrest.org*  
*260-982-2118*

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

Sincerely,

Sabine A. Thomas, HFA  
Timbercrest Senior Living Community

## **Regulatory Excellence**

We are obligated to follow federal, state and local laws that govern our business. We are all responsible for learning and staying current in order to perform our job responsibilities,

### ***Including:***

- Committing to honest and ethical billing and communications
- Avoiding any kickbacks for referrals
- Avoiding inducements
- Respecting copyright laws
- Operating with standards of financial practices and controls
- Dealing fairly with all who we come in contact with
- Integrity and accuracy of all documentation
- Voluntarily disclosing when we find we are out of compliance
- Cooperating with government investigations.

Disciplinary action will be taken against any T earn Member who fails to ad in accordance with the Code of Conduct, the compliance and ethics program, supporting policies and procedures and applicable federal and state laws.

**Our success depends on your commitment to ad with integrity, both personally and as part of our organization.**

## **A Personal Obligation**

You have a duty to report any problems you observe or perceive, regardless of your role.

### ***Three-Step Reporting Process***

1. Talk to your supervisor. He or she is most familiar with laws, regulations and policies that relate to your work.
2. If you are unable to talk to your supervisor, seek out another member of the management team or Human Resources.
3. If you still have a concern, contact the Compliance Official or a member of the organization's Compliance Committee.

If none of these resolve your issue, you may call the

**COMPLIANCE LINE:  
800-211-2713**

Your calls are confidential and you may call **ANONYMOUSLY** if you choose

KARLA DREISBACH, COMPLIANCE OFFICER  
FSA VICE PRESIDENT OF COMPLIANCE  
670 SENTRY PARKWAY, SUITE 120  
BLUE BELL, PA 19422-2325  
PHONE: 215-646-0720 FAX: 215-646-0724



## **Code of Conduct**



## **Code of Conduct for Timbercrest Senior Living Community**

TIMBERCREST SENIOR LIVING COMMUNITY is a Continuing Care Retirement Community.

Our compliance and ethics program covers the compliance issues, laws, regulations and guidelines that are relevant to a provider of senior services including independent living, residential living, skilled nursing services and adult day care.

Our Code of Conduct is a shared responsibility that applies to every person at every level of our organization. This includes employees, the board of directors, volunteers, independent contractors, subcontractors and vendors who may provide or are involved with healthcare or billing.

As you read this summary of our Code of Conduct, the word Team Member will be used. This term includes all employees, vendors, contractors, volunteers and directors and officers providing care and services here at TIMBERCREST SENIOR LIVING COMMUNITY.

Our Code of Conduct is supported and guided by policies and procedures. Any questions regarding our Code of Conduct or our policies and procedures can be directed to your immediate supervisor, the Compliance Official, any member of the Compliance Committee or the Compliance Officer.

For a copy of the entire Code of Conduct, please visit our website at: [www.timbercrest.org](http://www.timbercrest.org) or contact your Compliance Official:

Christy Huiras  
Compliance Official  
Phone: 260-982-3927  
Email: [chuiras@timbercrest.org](mailto:chuiras@timbercrest.org)

## **Care Excellence**

Our most important job is providing quality care to our residents. This means offering **compassionate support to our residents and working toward the best possible outcomes while following all applicable rules and regulations,**

### ***Including:***

- Honoring Resident Rights
- Zero tolerance for Abuse and Neglect

**Any Team Member who abuses or neglects a resident is subject to termination as well as legal and criminal action. Abuse and neglect are to be reported to your supervisor immediately.**

- Maintaining confidentiality of all resident information
- Respecting and protecting resident property to prevent loss, theft, damage and misuse
- Providing Quality Care
- Accurate assessments and care planning
- Providing only medically needed services
- Using current practice standards
- Accurate and timely documentation
- Measuring clinical outcomes
- Assuring our workforce has appropriate experience and expertise to provide services
- Quality Assurance Performance Improvement programs to improve outcomes
- Committing to comprehensive medically needed services. The Medical Director will have oversight of physicians and other medical services.

## **Professional Excellence**

The professional, responsible and ethical behavior of every Team Member reflects on the reputation of our organization and the services we provide. **Whether you work directly with residents, or in other areas that support resident services, you are expected to maintain our standards of honesty, integrity and professional excellence every day.**

### ***Including:***

- Hiring the best qualified employees regardless of race, color, age, religion, national origin, gender identity, sexual orientation or disability
- Employee screening
- Making the workplace a safe, ethical and comfortable environment, including a workplace free of substance abuse
- Assuring company privacy and assuring proprietary information is kept confidential
- Following the Gifts policies
- Reporting any actual or potential conflict of interests
- Using property appropriately and respecting property and copyright laws
- Ensuring appropriate use of computers which eliminates improper, unlawful activity, downloads or use of games on our community's computers
- Being responsible as an organization to have honest and ethical vendor relations
- Assuring truth in our marketing and advertising.

# RESPONSIBILITIES UNDER THE ELDER JUSTICE ACT

As an employee, volunteer or contactor (hereafter employee) of Timbercrest you are covered by the Elder Justice Act, a part of the Patient Protection and Affordable Care Act of 2010. This Act states:

Each employee, agent, contractor, manager, owner, or operator of this facility is individually responsible to report the reasonable suspicion of a crime against a resident. Reports of the reasonable suspicion of a crime against a resident of this facility must be made to the Indiana State Department of Health and a local law enforcement entity (Manchester Police Department) within 2 hours if there is serious bodily injury. If events causing the suspicion do not result in serious bodily injury, it must be reported within 24 hours after forming the suspicion.

Any incidents that would be considered a reasonable suspicion of a crime, should be reported to Timbercrest according to the Abuse Reporting Policy. Timbercrest's Abuse Reporting Policy follows the requirements of the Elder Justice Act.

Failure to report a reasonable suspicion of a crime against a resident may result in a civil monetary penalty of up to \$300,000 and exclusion from participation in any Federal health care program.

This facility may not retaliate against any employee who lawfully reports the reasonable suspicion of a crime against a resident as provided in Section 1150B of the Social Security Act. This facility may not discharge, demote, suspend, threaten, harass, or deny a promotion or other employment-related benefit to an employee, or in any other manner discriminate against an employee, in the terms and conditions of employment because of lawful acts done by the employee for making a report, causing a report to be made, or for taking steps in furtherance of making a report pursuant to the Act.

This facility may not file a complaint or report against a nurse or other employee with the appropriate state professional disciplinary agency because of lawful acts done by the nurse or employee for making a report, causing a report to be made, or for taking steps in furtherance of making a report pursuant to the Act. An employee may file a complaint with the Indiana State Department of Health against this facility if this facility retaliates against an employee who has lawfully reported the suspicion of a crime against a resident. To file a complaint, the employee may call the ISDH Complaint Hotline at 1-800-246-8909 or email the complaint to [complaints@isdh.in.gov](mailto:complaints@isdh.in.gov).