

July 22, 2022



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 these obligations and remind you that we encourage your feedback.

Compliance Program: Timbercrest Senior Living Community has a compliance program. The core document of any compliance program is the Code of Conduct which covers compliance issues, laws, regulations and guidelines that are relevant to providers of senior services. This Code of Conduct is applicable for 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. 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 a 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 responsible for staying current to perform our job duties, including:

- Honest, ethical billing and communications;
- Avoiding kickbacks for referrals;
- Avoiding inducements;
- Respecting copyright laws;
- Operating with standards of financial practices and controls;
- Dealing fairly with all we come in contact with;
- Documenting accurately and timely
- Voluntarily disclosing when we find we are out of compliance;
- Cooperating with government investigations.

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

**Your personal and professional
INTEGRITY = OUR SUCCESS**

A PERSONAL OBLIGATION

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

FOLLOW THESE STEPS:

- 1** Talk to your supervisor.
- 2** If you are unable to talk to your supervisor, seek out another member of management or Human Resources.
- 3** If you still have a concern, contact the Compliance Official or a member of the Compliance Committee.
- 4** Finally, call the
COMPLIANCE HOTLINE
800-211-2713
Confidential and Anonymous



Karla Dreisbach
Vice President of Compliance, FSA
460 Norristown Road, Suite 300
Blue Bell, PA 19422
Phone: 215.646.0720

TIMBERCREST

CODE OF CONDUCT



2201 East Street
North Manchester, IN 46962

Code of Conduct Timbercrest

TIMBERCREST SENIOR LIVING COMMUNITY is a Continuing Care Retirement Community.

Our compliance and ethics program covers the compliance issues, laws, regulations and guidelines relevant to a provider of senior services including residential, assisted living/personal care and skilled nursing services.

Our Code of Conduct is a shared responsibility that applies to every person at our organization. This includes all Team Members: employees, the board of directors, volunteers, independent contractors, subcontractors and vendors.

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

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

Christy Huiras
Compliance Official
Phone: 260-982-3927
Email: chuiras@timbercrest.org



Care Excellence

Our most important job is providing quality care to our residents. This means offering compassionate support 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 Associate who abuses or neglects a resident is subject to termination and 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;
- Conducting accurate assessments and care plans;
- Providing only medically needed services;
- Using current practice standards;
- Completing accurate, timely documentation;
- Measuring clinical outcomes;
- Assuring our workforce has appropriate experience and expertise to provide services;
- Implementing 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, you are expected to maintain standards of honesty, integrity and professional excellence every day.

THIS INCLUDES:

- Hiring the best qualified employees/ Team Members regardless of race, color, age, religion, national origin, gender identity, sexual orientation or disability;
- Completing employee/Team Member 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 Business Courtesies and Resident 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 for 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.