

Willow Point Nursing Home Corporate Compliance

Policy Statement:

Preventing and detecting health care fraud and abuse activities is an important fiduciary responsibility of management and all staff. This facility affirms to always deliver medically necessary services in the most efficient and prudent manner while providing professional quality care for each resident to attain and maintain the highest practicable physical, mental, and psychosocial well-being.

As such, Willow Point Nursing Home has adopted a Corporate Compliance Program, effective November 2000, to help ensure that the organization maintains the high level of honesty, professional, and ethical behavior in all aspects of its delivery of services and relations with residents, third party payers, employees, agents, and independent contractors. Our intent is to reasonably design, implement, and enforce a Corporate Compliance Program that will disclose, prevent, and detect misconduct. All staff, agents, and independent contractors are expected to understand and adhere to this compliance program.

Code of Conduct:

Assets	Financing/ Loan Agreements	Cash and Bank Accounts	Conflict of Interest
Billing	Medicare/Medicaid Anti Kick back	Bribes Gifts and Gratuities	Contributions
Non-Discrimination	Resident Rights	Competition (Anti-Trust)	Financial Reports
Research Grants	Confidential Information	Quality of Care	Tax Exemption

Protection Under the Law:

As Per the Federal False Claims Act (31 U.S.C. §3730(h)) , New York State False Claims Act (State Finance Law §191) and New York State Labor Law Sections 740 and 741 Willow Point Nursing Home will not take any retaliatory personnel action (discharge, suspension, demotion, or other adverse employment action) against an employee because the employee:

- Discloses or threatens to disclose to a supervisor or to a public body an activity of the employer that is illegal and that presents a substantial and specific danger to public health or safety;
- Provides information to or testifies before a public body that is conducting an investigation or hearing into the employer's violation of law;
- Objects to or refuses to participate in the illegal activity of the employer;
- Discloses to a supervisor or public body that he or she reasonably believes, in good faith, that the employer is providing improper quality of resident care;
- Objects to or refuses to participate in any practice of providing "improper quality of resident care.

Consequences of Not Reporting:

- Disciplinary Action as per Civil Service Law and Bargaining Unit Contract
- Fines, Restitution, and/or criminal prosecution

To Make a Report:

Direct Supervisor

Kevin Carey, Nursing Home Administrator

607-763-4201

Edith Howland, Corporate Compliance Officer

607-763-1742

Corporate Compliance Hotline

800-836-0872

E-mail

WPNHcorporatecompliance@co.broome.ny.us

Suggestion Box

Located in the main lobby

Corporate Compliance is Everyone's Responsibility!