



MENNONITE VILLAGE

Providing Life-Enriching Services Since 1947

Dear Vendor/Contractor/Health Care and Service Provider:

Mennonite Village is committed to ethical practices and expects every team member (including employees, contractors, vendors, volunteers and board members) to be vigilant in maintaining these standards at all times. Please ensure that your staff is familiar with the laws and regulations listed below.

Mennonite Village's **Code of Conduct** is the core document covering the regulations that are relevant to providers of senior services and it pertains to all team members. You are obligated to abide by our Code of Conduct as a requirement of doing business with us. Mennonite Village is also committed to an active **Abuse, Neglect, and Risk Management Program**.

On our website's Resource Page, <https://mennonitevillage.org/resources-2/>, you will find the **Code of Conduct** summary and also information on what constitutes **Abuse and Neglect**, along with other information about our program and who to contact if you suspect any violations to Resident Rights.

Mennonite Village performs **monthly sanction checks** and cannot do business with any individual or entity sanctioned by the Federal or State Government. It is your duty to inform us immediately if your organization or anyone under your employment is currently excluded or becomes excluded in the future. We are also committed to providing **Whistleblower Protection** as explained in the False Claims Act; see reverse for explanation of this policy.

According to the **Elder Justice Act**, 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 in a timely matter their reasonable suspicion of crimes committed against any resident on our campus. 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 that all of your employees who, in the course of business, are present on our campus are aware of these obligations. You are encouraged to communicate any compliance concerns to our compliance official listed below. If you or one of your staff members prefer to report anonymously, please use the Compliance Hot Line: 800-211-2713 (available 24/7).

Please contact us if you have any questions.

Sincerely,

Arielle Schultz

Compliance & Risk Manager

arielleh@mennonitevillage.org

Deficit Reduction Act: Mennonite Village is committed to ethical, honest billing practices and expects every team member (including employees, independent contractors, vendors, and volunteers) 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 "Whistleblower" Protections (31 U.S.C. § 3730)

The False Claims Act

- A federal statute that imposes civil liability for fraud involving any federally funded government program such as Medicare or Medicaid.
- The federal government may bring a lawsuit under the False Claims Act against any person or entity whom it believes has knowingly presented, or caused to be presented, a false or fraudulent request for payment from the federal government, or who has made a false statement or used a false record to get a claim approved.

Federal "Whistleblower" Protections

- In order to encourage individuals to come forward and report misconduct involving false claims, the False Claims Act includes a whistleblower provision that offers incentives and protections for persons who report such misconduct.
- In general, this provision allows any person who knows about the submission of false claims to the government (such as to Medicare or Medicaid) to bring forth a lawsuit for a violation of the False Claims Act on behalf of the federal government.
- The lawsuit will be filed "under seal" which means that the lawsuit is kept confidential while the government investigates the allegation and decides how to proceed.
- If a whistleblower is fired, demoted, suspended, threatened, harassed or in any way discriminated against by his or her employer for his or her involvement in a False Claims Act, the whistleblower is entitled to all relief required to make him or her whole.
- Such relief can include reinstatement with the same seniority status he or she had before the discrimination, double back pay, interest on the back pay and compensation for any special damages sustained as a result of the discriminatory treatment, including reasonable attorney fees and litigation costs.