



Residential solutions for people with challenging needs

Corporate Compliance Plan

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HomeLife, Inc.
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HomeLife, Inc.

Organizational Code of Ethics and Corporate Compliance Plan

What are Ethics and Corporate Compliance?

Ethics are a set of values and beliefs. Ethical practice means working and providing care in a way that is honest, legal and respectful of others; and reflects the mission and values of HomeLife, Inc.

Corporate Compliance means abiding by the law and following HomeLife, Inc. policies which are designed to engender ethical behavior. The purpose of this Corporate Compliance Plan (CCP) is to help prevent fraud, abuse, and other unethical practices; and to ensure all employees are striving to meet the highest standards of ethical conduct.

The HomeLife, Inc. Employee Handbook contains several policies which address a variety of corporate and ethical issues, and are designed to help employees understand their rights and responsibilities, to work more efficiently, and to behave and provide care in an ethical way.

This document serves as the HomeLife, Inc. Corporate Compliance Plan (CCP). Several areas of concern are briefly defined, and references to specific sections of the Employee Handbook are identified for more in depth understanding. Remember it is your responsibility to know and understand the policies contained within the Employee Handbook.

Corporate Compliance Officer (CCO):

The corporate compliance officer is the individual who assists in ensuring the policies of the organization are carried out properly. Reports regarding incidents of suspected corporate fraud and abuse can be made to the Home manager or directly to the CCO. These reports may be made openly or anonymously; and will not result in retaliation by the organization. Although every effort will be made to maintain the confidentiality regarding the identity of the person making a report, there may be a point in certain instances where that person's identity may become known, or may need to be revealed. An investigation will be conducted based on all reports, and disciplinary action may be applied to individuals for whom fraud and or abuse can be substantiated.

The HomeLife, Inc. CCO is:
Scott M. Christ, Vice President
Phone: 269-373-5919
Fax: 269-373-5918
E-Mail: SChrist939@aol.com

Professional Conduct:

The Purpose, Mission and Values of HomeLife, Inc. are described in the first section of the Employee Handbook. In summary, it is our mission to provide safe, home-like environments which enrich the quality of lives of the persons we serve. We value a focus on the customers, and meeting their needs by treating them with the highest level of compassion, respect, and dignity. HomeLife, Inc. also values individual development and teamwork among staff, with a continuing process of quality improvement of all systems and procedures used in our programs.

Personal Behavior:

Employees of HomeLife, Inc. are expected to conduct themselves in a professional manner which is respectful to all the customers we serve. The Employee Relations and Conduct Section of the Employee Handbook specifies areas of expected behavior. These policies outline expectations including but not limited to dress code & appearance, interactions with Residents and other customers and agencies, reporting requirements and confidentiality. Some behaviors of staff are prohibited and may result in disciplinary action including suspension and/or termination of employment. Please refer to your Employee Handbook for more specific information on prohibited behaviors which include but are not limited to falsification of information, billing fraud, documentation fraud, harassment, discrimination, mistreatment, abuse, neglect, theft. It should also be noted that staff who witness such behaviors in co-workers are obligated to report this information to the Home Manager or CCO immediately. Staff that observe unethical conduct and do not report it, may also be considered responsible for violations of the code of conduct described above.

Business Practices:

HomeLife, Inc. staff who are involved with billing practices and other business/administrative responsibilities are also expected to uphold certain ethical practices.

Unethical business practices may include but are not limited to....

Unlawful Billing Practices:

- Duplicate billing, or billing more than one claim for the same service
- Up coding and DRG creep, or using a billing code that gives higher payment rather than the billing code that reflects the actual services provided. (DRG stands for diagnostic-related group)

False Claims:

- Filing claims for services that were not provided
- Filing claims for services that are not medically necessary

Kickbacks:

- Receiving benefits for promoting certain brands of drugs, or medical equipment
- Receiving gifts or services from residents in exchange for using certain medications and products.

Unbundling:

- This can happen when separate claims are submitted for services that should be billed together in a single claim.

Filing Unnecessary Claims with Medicare or Medicaid:

- One of the reasons for developing a CCP is to prevent Medicare and Medicaid fraud. It is illegal to bill Medicare or Medicaid for services that are not reasonable or medically necessary.

Business Records and Cost Reports:

- These records must be kept up-to-date and accurate. Never falsify or alter business records or cost/mileage reports, it is illegal.

The practices described above are considered unethical and illegal. If you know of any wrong doing in this area, it is your responsibility to report it. Disciplinary action up to termination may be applied to staff who engage in illegal billing activities, or corporate fraud and abuse as described above.

Marketing Practices:

All business and administrative practices including marketing of programs and services must be done ethically and legally. This includes the following areas:

- **Illegal Referrals:** It is illegal to refer a patient to a particular facility or healthcare provider in exchange for certain benefits.
- **Joint Ventures:** It is wrong for a healthcare provider to refer patients to each other in exchange for certain benefits. This is similar to a kickback.

Clinical Practices:

Practicing ethics within the Corporate Compliance Plan (CCP) means honoring residents' rights, and treating them with respect and dignity. Complete listings of Resident Rights are located in the Employee Handbook, and Resident and Family Handbook.

A summary of rights are listed below:

- **Treatment:** Residents have the right to be treated without discrimination of any kind. If you witness discrimination report it to the Home Manager or the CCO.
- **Confidentiality:** Access to a resident's records should be limited to those individuals involved in his or her care. All aspects of an individual in our care should remain confidential. If you need to discuss a resident's care or records, it should be done in a private setting.
- **Respect:** Provide any care you give in a way that respects the individual's values, needs and wishes.
- **Privacy:** Help ensure that all care (examinations, tests, clinical discussions, etc.) are done in a way that respects the resident's dignity at all times.
- **Advanced Medical Directives:** These include a living will, and/or durable power of attorney for healthcare. Residents who have advanced directives will have that denoted on the cover of their clinical record; you should be aware if a resident has an Advanced Directive.
- **Involvement in Care Decisions:** Residents have the right to be involved in making decisions about their care. They also have the right to refuse care as coordinated with their guardianship status. You should know the residents wishes before providing care.
- **Informed Consent:** Gives the residents all the information they need to make informed decisions. Make sure they know their treatment options, including, benefits, risks, side effects, and costs of each.
- **Access to information:** Residents have the right to see their medical records and get information about their diagnosis, condition, treatment and chances for recovery. The Resident and Family Handbook describes the procedure for a Resident to access their own clinical records, if a resident makes a request to see their records inform the Home Manager for assistance in following the described procedure.

Information Management:

Accurate and truthful documentation and management of information is a critical concern of the CCP.

- **Medical Records:** Records must be complete and accurate and up to date. Never change the dates in a Resident's Clinical Record.
- **Documentation:** All care given to residents must be recorded. An individual's progress should be documented, and all entries should be signed and dated.
- **Releasing Resident Information:** Resident Information is confidential and should not be given out to unauthorized persons, without guardian approval. Please refer to the resident confidentiality section of the employee handbook for more specific information, and your responsibilities.
- **Required Reporting:** It is your responsibility as a staff member of HomeLife, Inc. to report misconduct, harassment, criminal acts such as theft, drug use, and assault. In many instances, a failure to report such acts to your supervisor makes you responsible for their conduct. A Listing which summarizes reporting requirements for abuse and neglect are posted in each HomeLife, Inc. home.

Employee Rights and Responsibilities:

Under the Corporate Compliance Plan, you have the right to receive education and training regarding your role within the organization and compliance with the CCP and the law; and the reporting procedure for violations of the CCP. Training in Corporate Compliance will occur at New Employee Orientation, and annually thereafter. HomeLife, Inc requires documentation that you have been trained regarding the CCP and you will be asked to sign a statement that you understand your responsibilities under the CCP.

Your responsibilities may vary depending on your position within the organization. In general, all staff should:

- Follow proper procedures in the areas where you work.
- Treat all Residents, customers, visitors, and co-workers with respect.
- Report any fraud, waste or abuse to your supervisor, Home Manager or CCO immediately.

Read your Employee Handbook for a complete description of your rights and responsibilities which are summarized here within this Corporate Compliance Plan.

Procedures for investigating and correcting violations:

An audit of billing records for compliance with the “business practices” described above occurs quarterly. An audit of clinical records and “clinical practices” described above occurs quarterly at all HomeLife, Inc. service locations. Violations of the CCP and corrective actions are documented on separate quarterly reports for financial and clinical information. A Corporate Compliance Report is generated annually identifying a summary of results from the above audits and complaints received by the Corporate Compliance Officer. All complaints and violations will be investigated by the Corporate Compliance Officer and systematic corrective actions will be applied in an effort to ensure substantiated violations will not be repeated. This report is then submitted and reviewed by the Board of Directors annually.

The HomeLife, Inc. Corporate Compliance Officer (CCO) is:

Scott M. Christ, Vice President
5420A Beckley Road, PMB 234
Battle Creek, MI 49015
Phone: 269-373-5919
Fax: 269-373-5918
E-Mail: SChrist939@aol.com

If you suspect a violation of Corporate Compliance:

Contact the Home Manager or Corporate Compliance Officer: Scott Christ, Vice President 269-373-5919. Reports can be made verbally over the phone or via voicemail; written reports can be submitted via fax, mail or e-mail. In all reporting, please provide as much specific information as possible including names of involved individuals, dates and times, and an objective description of the suspected fraud or abuse. If the Corporate Compliance Officer is involved in the suspected fraud or abuse, a report can be made directly to Barry J. Bruns, President, Phone: 269-660-0854.

HomeLife, Inc. honors a no reprisal system for abuse reporting. Making a report will not result in disciplinary action, if you have complied with the HomeLife, Inc. Corporate Code of Ethics.

If you do not follow the Corporate Code of Ethics:

You may be subject to disciplinary action up to and including termination. If you break the law, you can face criminal charges and heavy fines. It is your job to know your responsibilities. Even if you break the law unintentionally, you can be held responsible.

Barry Jay Bruns, President

Scott M. Christ, Vice President

HomeLife, Inc.

Corporate Compliance Test of your Knowledge

1. Corporate Compliance Plans help promote ethical practice.... p True p False
2. A Corporate Compliance Officer (CCO) is the person to contact if you want to file a report..... p True p False
3. It's OK to receive benefits in exchange for promoting certain medications and products..... p True p False
4. The only reason to have a CCP is to save money..... p True p False
5. Falsifying records is not considered fraud..... p True p False
6. Ethics only involve treatment of residents.....p True p False
7. You should never change a date on a resident's record.....p True p False
8. Residents have a right to see their medical records.....p True p False
9. You can be held responsible for breaking the law, Even if you did it unintentionally.....p True p False
10. You are responsible to know the information contained in your employee handbook..... p True p False

I have received a copy of the HomeLife, Inc. Corporate Compliance Plan; I have received training regarding its contents, and I understand my responsibility to know this information. If I have any questions I know I may contact the Corporate Compliance Officer or Home Manager.

Employee's Signature

Date

Instructor/Supervisor's Signature

Date