

**Compliance
and Privacy
Program**

and

**Values and
Expectations
Statement**

**DOCK WOODS
COMMUNITY**

Mennonite Values

We believe in the intrinsic worth of each person and that God created all people in God's own image as physical, intellectual and spiritual beings.

We believe that true healing and wholeness can only occur if we attend to the restoration of the spirit as well as the mind and body; a strong relationship with God can transform people and make them whole even if their body remains broken.

We believe that God calls us to share the gifts given to each of us, serving others in the name of Christ so that the Kingdom of God may be made visible among and through us.

We believe that everything belongs to God and that as good stewards we have a responsibility to care for the earth and all who live on it.

We believe that God's love calls us to bring health, wholeness and justice to the world; this includes particular attention to meeting the needs of the poor, the vulnerable and the marginalized.

We believe that God calls us to live in peace with all people and to bring reconciliation and the peace of Christ to those whose lives are marred by violence and discord.

We believe, in the context of ethical rigor, that God calls us to make the resources and support of the community of faith available to individuals and families as they face difficult decisions.

Mission Statement

Dock Woods Community is a living dedication to the enhancement of life for older adults and families, rooted in the Mennonite heritage of Christian Values.

Dock Woods Community Compliance and Privacy Program

Dock Woods Community has developed a Compliance and Privacy Program to assure that we operate within the law and in keeping with our own highest ethical standards.

Dock Woods Community's Compliance and Privacy Program covers Medicare and Medicaid regulatory issues, Centers for Medicare and Medicaid Services and Office of Inspector General issues and other business issues. Dock Woods Community's Compliance and Privacy Program is structured as follows:

- The Senior Director of Compliance and Privacy is Dock Woods Community's Compliance and Privacy Officer.
- The Health Information Coordinator is our Compliance and Privacy Liaison.
- A Compliance and Privacy Committee has been created at Dock Woods Community. This committee is made up of representatives of different departments within Dock Woods Community.

Employee Training

Dock Woods Community, through the Compliance and Privacy Officer and Liaison, will provide a training program to educate all employees of Dock Woods Community about the Program.

Monitoring, Reporting, and Enforcement:

Monitoring

Dock Woods Community will, on a quarterly basis, review resident/client care, billing procedures, claims processing, reimbursement practices, documentation practices and compliance with privacy regulations under the direction of the Compliance and Privacy Officer or his designee.

Reporting of Violations and Employee Hotline

If any employee has information about unethical behavior, criminal activity or other work-related concerns, he or she should speak with a member of management. If an employee is uncomfortable talking directly to management, he or she can use the Peace Church Compliance Line at (800) 211-2713. This is an anonymous line for employee use, 7 days per week, 24 hours a day.

Government Investigations

It is Dock Woods Community's policy to cooperate with reasonable requests from any governmental agency concerning our operations. If a government agent seeks to contact you directly, you should know: (1) staff members have the right to speak or decline to speak, as all such conversation is voluntary; (2) staff members have the right to speak to an attorney before deciding to be interviewed; and (3) staff members can insist that an attorney be present if they agree to be interviewed.

Disciplinary Actions

Disciplinary action, from counseling to termination, may result if any employee is found to have knowingly violated the policies and procedures of Dock Woods Community.

Values and Expectations

It is the personal responsibility of all employees to fully understand the policies and procedures applicable to their assigned duties and to conduct themselves accordingly.

Each employee should carry out their work on the basis of the following values and expectations:

Resident/Client Care and Rights

- Our highest priority is the health and safety of our residents/clients and our employees.
- Compassion and care are part of our commitment to the community we serve.
- We involve residents in all aspects of their care and obtain informed consent for treatment.
- Residents and their representatives will be assured appropriate confidentiality, privacy, security and protective services, and opportunity for resolution of complaints.
- Residents are treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights, and involvement in their own care.
- Our organization's values and federal regulations recognize residents' rights to be free of physical restraints imposed or drugs administered for the purposes of discipline or staff convenience.

Resident information

- We do not release or discuss information about specific residents with others unless it is necessary to serve the resident or required by law.
- No employee may ever disclose confidential information that violates the privacy rights of our residents.
- Our organization will provide resident/client or their representative with a Notice of Privacy Practices upon admission.

Resident/Client Referrals

- We do not pay for referrals. We do not pay or offer to pay anyone—colleagues, physicians, or other persons—for referral of residents.
- We do not accept payment for referrals that we make to other service providers.

Billing and Clinical Records

- We take great care to assure that all billings to government, clients and private insurance payers reflect truth and accuracy.
- We only bill for services actually provided.
- We maintain current and accurate medical records.

Cost Reporting

- We comply with federal and state laws relating to all cost reports.

Regulatory Compliance

- All staff must be knowledgeable about and insure compliance with all laws and regulations, as they apply in their field or expertise.

Physicians

- Any business agreement with a physician must ensure compliance with legal requirements.

Relations with Government

- We are honest in dealings with government officials.
- We do not offer or make payments or give anything of value to an employee or representative of a government agency at any level.

Relationships with Subcontractors, Suppliers, Consultants, and Vendors

- All officers and employees will comply with Dock Woods Community's policies on acceptance of gifts and courtesies from vendors.
- Employees and officers must comply with Dock Woods Community's policies on disclosure of conflicts of interest.
- Any subcontractors who will receive resident/client information, with the exception of care providers, will enter into a Business Associate Agreement with our organization.

Additional Standards

- Dock Woods Community only employs or works with persons with proper credentials, experience and expertise.
- No deficiency or error should be ignored or covered up.
- Employees will not pursue any business opportunity that requires unethical or illegal activity.

DOCK WOODS COMMUNITY

- Employees must comply with Dock Woods Community's policies governing private employment by resident/clients.
- Employees must comply with Dock Woods Community's policies on acceptance of gifts, entertainment, or other courtesies from residents/clients.
- Employees must comply with Dock Woods Community's policies on pursuit of outside business interests while on the job.
- Employees are not authorized to enter into any joint venture, partnership, or other revenue sharing arrangement with any entity that is a potential or actual referral source.
- No funds or assets of Dock Woods Community shall be used for federal, state or local political contributions.
- Employees shall comply fully with policies and procedures concerning the accuracy and reliability of all business and clinical records.

Administration of the Values and Expectations Statement

- Any questions regarding the Values and Expectations Statement should be directed to the employee's supervisor or to the Compliance and Privacy Liaison. Employees are expected to cooperate fully in any investigation of a potential violation.