

Corporate Compliance Plan

August 2019

Baptist
SENIOR
SERVICES

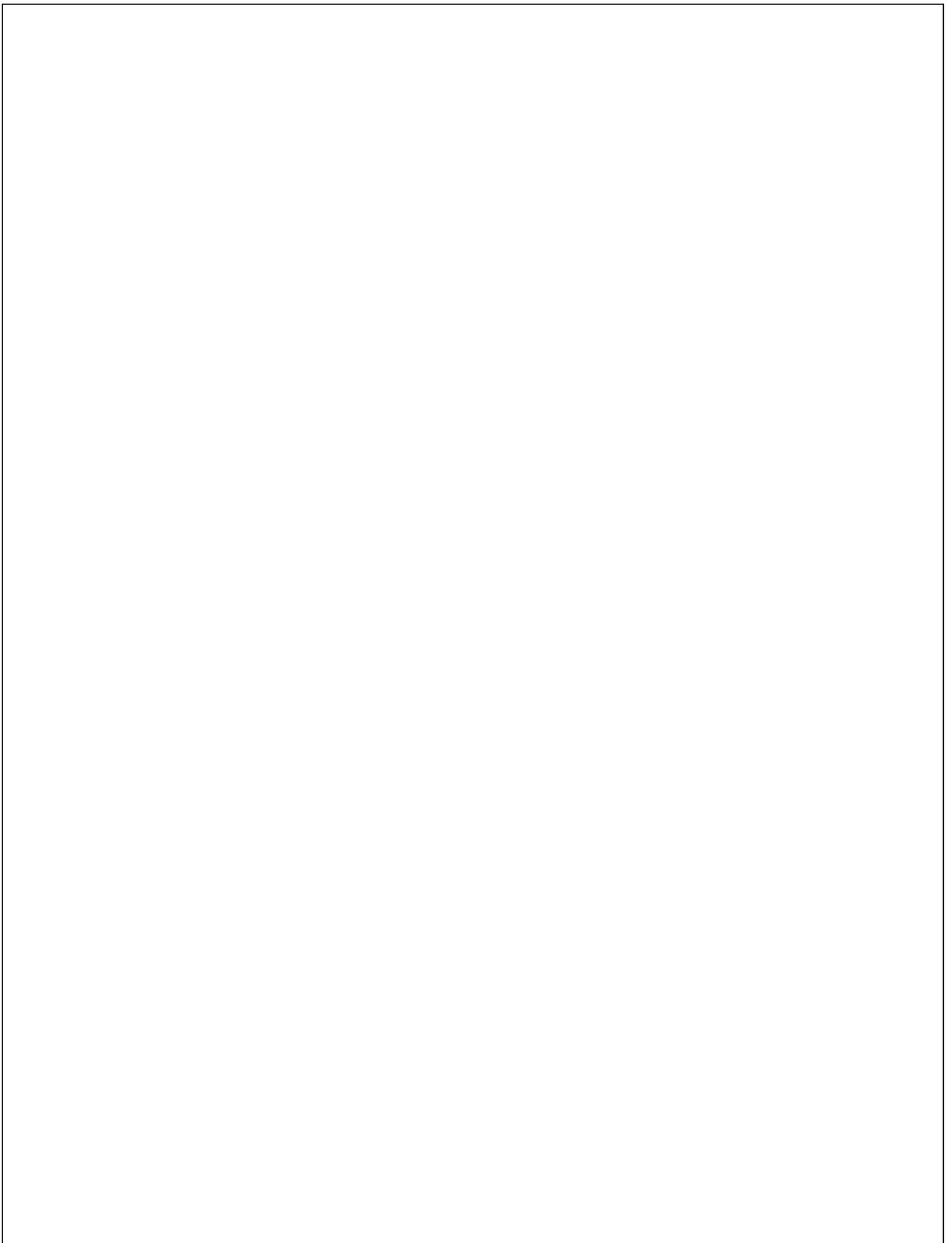
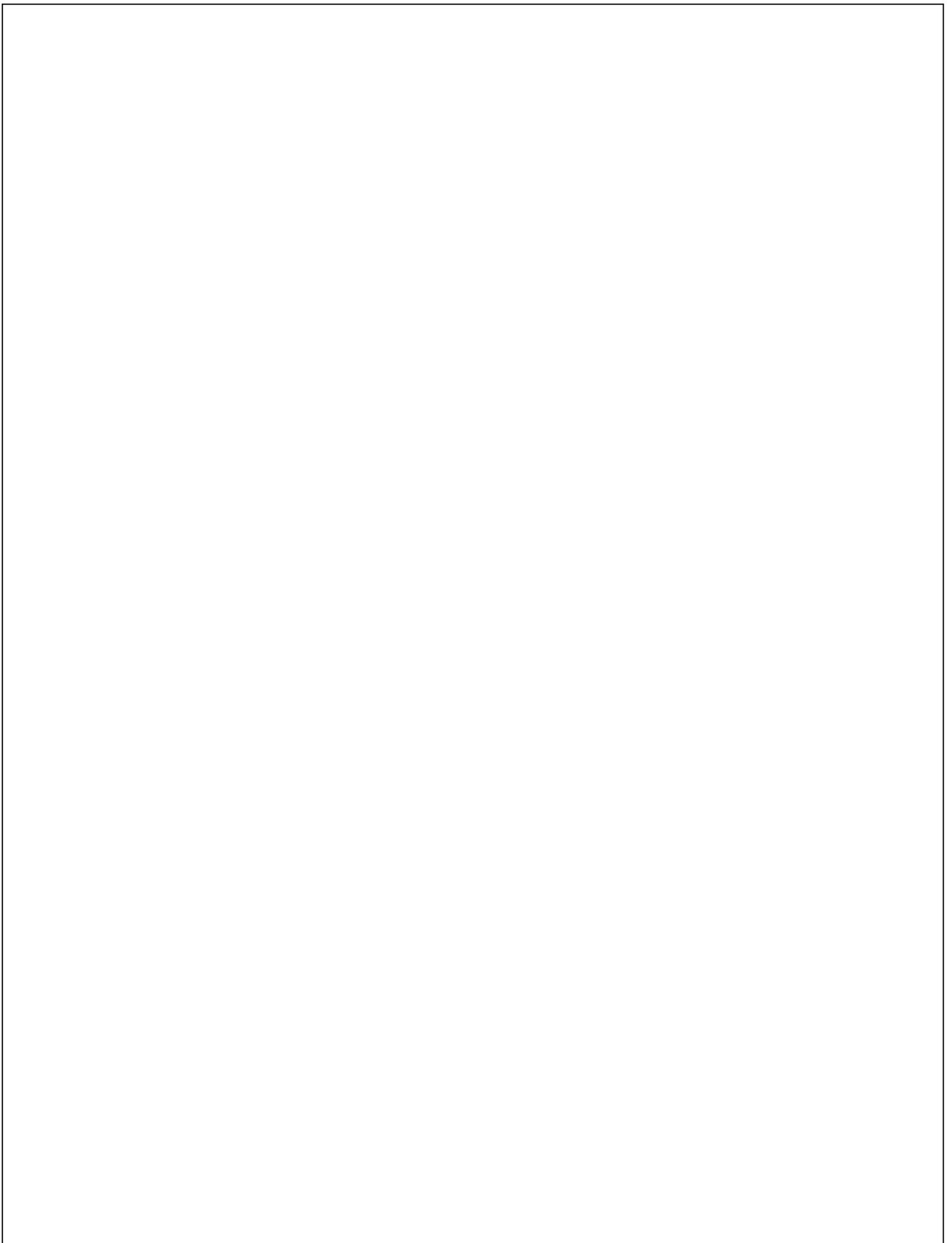


Table of Contents

I.	Overview of Corporate Compliance Plan.....	1
A.	Our Vision, Mission, and Value Statements.....	1
B.	Code of Ethics.....	2
II.	Baptist Senior Services Corporate Compliance Plan	2
A.	Oversight.....	2
B.	General Compliance Standards.....	2
1.	Admission and Provision of Services	3
2.	Confidentiality	3
3.	Conflicts of Interest.....	3
4.	Business Practices	3
5.	Contacts from Government or Other External Auditors.....	4
6.	Accounting and Financial Reporting	5
7.	Human Resources	5
8.	Other Legal and Regulatory Requirements	6
C.	Reporting Compliance-Related Concerns and Questions.....	8
1.	Types of Issues to Report.....	8
2.	Reporting Procedure and Compliance Hotline	8
3.	Investigation and Follow-Up Action.....	8
4.	Non-Retaliation Policy.....	8
D.	Disciplinary Action	9
E.	Education and Training.....	9
1.	Initial Training and Certification	9
2.	Ongoing Training and Education.....	9
F.	Auditing and Monitoring	9
1.	Monitoring the Corporate Compliance Program	9
2.	Compliance Audits.....	10
3.	Compliance as an Element of Performance Evaluation.....	10
4.	Facility Reports to Risk Management Committee.....	10
III.	Certification Form	11



I. Overview of Corporate Compliance Plan

Our corporate compliance plan reflects the commitment of Baptist Senior Services to comply with the laws and regulations that apply to our business, and to promote the highest standards of ethics in the conduct of that business. Baptist Senior Services includes Baptist Homes Society (Baptist Homes, Providence Point) and Baptist Homes Foundation as well as any subsidiaries and/or affiliates that may be added in the future.

Our corporate compliance plan includes, but is not limited to, the requirements of the Centers for Medicare and Medicaid Services (CMS), the Pennsylvania Department of Health, the Pennsylvania Department of Human Services, the Department of Housing and Urban Development (HUD), the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Patient Protection and Affordable Care Act of 2010 and the Elder Justice Act. It also addresses our organization's Code of Ethics, which is established by our Society Board of Directors.

We hold all organization staff, Board, physicians, contractors, and vendors responsible for conducting themselves in accord with the standards of our compliance plan, and require anyone who has concerns or questions regarding ethical or compliance issues to immediately contact his/her Supervisor, Department Director, Executive Director, President & CEO or the Corporate Compliance Officer in person or via the compliance hotline at (412) 572-8360. Baptist Senior Services makes every effort to maintain, within the limits of the law, the confidentiality of the identity of any individual who reports possible misconduct, and will not tolerate any form of retaliation, retribution, sanctions, or discipline for anyone who enters a good faith report of a possible violation.

Conduct in violation of the standards of our corporate compliance plan will result in consequences up to and including termination of the employment or business relationship.

A. Our Vision, Mission, and Value Statements

Vision:

Seniors in our communities will experience the most fulfilling life possible.

Mission:

To provide the highest quality of living for all those we serve, while uplifting one person at a time.

Value Statements:

Faith: Rooted in our heritage, we are called to express Christian love for all, to be a witness to God's love, to be responsible members of our community, and good stewards of all the resources which have been entrusted to us.

Benevolence: Combining sound fiscal management with the highest quality of services, we offer as many of our services to those in financial need as is consistent with prudent stewardship.

Service: We are called to excellence in our service. We believe in growth which responds to current needs, anticipates the challenges of the future, and enhances the basic values and character of our ministry. Every person who is a part of our family, including residents, employees, families, volunteers, and visitors, is to be treated in a loving, respectful manner consistent with our Christian teachings about the special value of each individual. We strive to foster self-esteem and integrity among all members of our family.

Ethics: Our high regard for Christian ethical behavior is to be reflected throughout the organization including relationships with residents, their families, employees, communities, and those with whom we do business.

Wellness: We affirm the right of all individuals in our communities to achieve their highest level of well-being in mind, body and spirit. We are committed to providing an environment that encourages

and supports the components of wellness: physical, emotional, spiritual, social, intellectual, and community.

B. Code of Ethics

Our organization's Code of Ethics emphasizes the fundamental standards expected of our staff members and business partners, which are outlined in greater detail throughout this compliance plan:

- *Treat Residents and Each Other with Respect, Dignity and Courtesy.*
- *Provide Quality Care and Services.*
- *Report Suspected Misconduct.*
- *Maintain Confidentiality.*
- *Avoid Conflicts of Interest.*
- *Observe Ethical Business Practices.*
- *Maintain Appropriate Relationships with Residents.*
- *Safeguard Funds and Resources.*

II. Baptist Senior Services Corporate Compliance Plan

A. Oversight

The Baptist Senior Services' Board of Directors and the President & CEO oversee the implementation of the corporate compliance program, and make reasonable efforts to assure that appropriate financial and human resources are available to support the program on an ongoing basis.

The Baptist Senior Services' Risk Management Committee implements written compliance-related policies and procedures, and conducts periodic reviews of compliance-related issues. Detailed compliance related policies are 103, 114, and 118 of the organization's Corporate Policy and Procedure Manual. The Risk Management Committee is comprised of, but not limited to, individuals in the following positions: President & CEO, Executive Director (of all communities), Compliance Officer, Chief Financial Officer, Director of Human Resources, Director of Marketing and Public Relations, Board representation; Directors of Resident Services, Nursing, Independent Living, and Personal Care (of all communities), and insurance broker representative(s). The Risk Management Committee meets quarterly.

Through its Quality Assurance Performance Improvement (QAPI) process, the organization conducts monthly audits which are reviewed quarterly. Specific key indicators, which reflect a number of these audits, are reported to the Board of Directors quarterly.

The Corporate Compliance Officer monitors the compliance hotline, and investigates and addresses compliance-related concerns and questions. The Compliance Officer can be reached via the Compliance Hotline at (412) 572-8360.

B. General Compliance Standards

Baptist Senior Services is committed to complying with **all** applicable laws and regulations. The following general compliance standards are not an exhaustive list, but serve as a guideline for our operations, and identify the types of conduct that the compliance program is designed to prevent.

Both the Risk Management Committee and the Corporate Compliance Officer are prepared to provide individuals with assistance in meeting the standards of our corporate compliance plan

1. Admission and Provision of Services

Admission, Transfer, and Discharge Practices

Baptist Senior Services makes no distinction in the admission, transfer, discharge, or care of residents based on race, color, religion, disability, ancestry, national origin (including limited English proficiency), age, sex or sexual orientation. Clinical care is based on identified resident health care needs, not on payment source or organization economics.

Resident Freedom of Choice

Baptist Senior Services respects a resident's freedom to choose the healthcare provider of his/her choice. According to Medicare law, an individual who is entitled to benefits may obtain healthcare services from any institution, agency, or person which is qualified to participate in the Medicare program, and which chooses to provide the services. Examples include, but are not limited to, hospitals, hospice services, and attending physicians.

Resident Rights

Baptist Senior Services provides each resident a written statement of resident rights, facility charges, and as applicable, a clear explanation of care. All residents are treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights, and involvement in their own care. Residents may select advance directives, including living wills and durable powers of attorney, which are honored to the extent permitted by law and within the capabilities of Baptist Senior Services.

Quality Care and Services

Baptist Senior Services employs or contracts only with those persons who have proper credentials and experience, conform to the standards of their respective professions, and exercise sound judgment in the performance of their duties.

2. Confidentiality

A resident's medical, financial, or other personal information is not disclosed to anyone except as permitted by law, or with the resident's permission. Electronic transmission of claims for payment, assessment information, and other data are completed in accordance with all applicable legal guidelines.

Staff members have an obligation to maintain the confidentiality of salary, benefit, and other personal information related to staff members, and to prevent the release of this information beyond those individuals who may need it to fulfill their job responsibilities. We maintain personnel files, payroll information, disciplinary matters, and other personal information in a manner designed to ensure confidentiality.

Information concerning Baptist Senior Services' business dealings and practices, business records, trade secrets, strategic initiatives, etc. is proprietary information and is not shared with others outside the organization, except as required by law or the terms of a consulting or other business relationship approved by the President & CEO.

3. Conflicts of Interest

A conflict of interest generally exists when a staff or Board member's personal interests or activities could influence judgment in the performance of duties for Baptist Senior Services. Staff and Board members may not use their positions to profit personally, or to assist others in profiting, at the expense of the organization.

4. Business Practices

Business transactions between Baptist Senior Services and its vendors, contractors, or other third parties are conducted in a fair and impartial manner. Staff and Board members

accurately represent the organization, and do not engage in any activity or scheme intended to defraud anyone of money, property, or services.

Tips and Gifts: No Baptist Senior Services' staff member may request or accept tips or gifts from residents, families, visitors, or vendors. Gifts that can be shared with others, such as food, may be accepted if they are made available for other staff members to enjoy. Acceptance of meals, or other entertainment for the purpose of meeting to discuss business matters, is permissible as long as the meal or entertainment is not of more than nominal value. Gifts of money are prohibited regardless of the amount.

Fundraising: The "Anti-Kickback Statute," prohibits accepting a gift or donation which is intended, or implied, as a kickback and/or incentive for business or services. There is no prohibition against the offer, or acceptance, of a gift or donation intended to support the charitable mission of Baptist Senior Services. Acceptance of such a gift or donation from a business partner or vendor does not imply that a relationship will be preserved, result in increased business or preferential treatment, result in recommendations or referrals, or be considered in making any decisions related to the preservation of a relationship with that vendor or business partner.

Contracts: We conduct our contract development process in accordance with established organization policies. Staff and Board members must not disclose proprietary information about the organization in order to further their own interests, or those of a vendor, or contractor. Staff and Board members must disclose any personal relationships or business activities with contractors that may be perceived as influencing the performance of their duties.

Marketing: Marketing practices are conducted with truth, fairness, and responsibility to residents, the community and the public at large. All information issued is accurate at the time of publication, and is not presented in an intentionally misleading manner. Baptist Senior Services will not purposely misrepresent its services, supply needs, or any other aspect of its business.

Power of Attorney: It is the policy of Baptist Senior Services to enforce the regulatory prohibition that no employee, member of the Board, or anyone having a financial interest in the facility may assume power of attorney (POA) for a resident, unless for an immediate family member, or unless ordered by a court of competent jurisdiction. Immediate family member includes: spouse; birth or adoptive parent, child, or sibling; stepparent, stepbrother, or stepsister; father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law; grandparent or grandchild; aunt or uncle; and spouse of a grandparent or grandchild.

5. Contacts from Government or Other External Auditors

Baptist Senior Services is committed to full compliance with all state and federal laws and cooperates with all reasonable demands made in any governmental investigation of Baptist Senior Services, its employees, or agents. However, Baptist Senior Services deems it essential that the legal rights of Baptist Senior Services, its employees, and agents are protected. If any employee receives a subpoena, inquiry or other legal document concerning Baptist Senior Services, whether at home or in the workplace, from any governmental agency, the employee shall first notify his/her supervisor who shall then alert the Executive Director who shall alert the Corporate Compliance Officer. The Corporate Compliance Officer shall alert the President & CEO, and Baptist Homes Council, as soon as possible. The contacted employee may request the assistance of counsel or appropriate Baptist Senior Services' personnel prior to responding to inquiries. Baptist Senior Services may provide access to Counsel for such employees. However, by making Counsel or staff available, Baptist Senior Services has no intent to interfere with or deter a lawful government investigation.

6. Accounting and Financial Reporting

Accounting

All Baptist Senior Services' assets and financial transactions are accurately and properly documented in accordance with generally acceptable accounting principles. Federal law requires that our books and records accurately reflect all transactions, including any payment of money, transfer of property, or furnishing of services. We comply with a variety of laws regarding the retention of books, records, and documents. Staff members cooperate fully with auditors or legal counsel retained by the organization to conduct audits or investigations pertaining to this guideline.

Cost Reports

It is the policy of the organization to accurately record and allocate its costs in accordance with Medicare and Medicaid regulations. Medical and business documents and records are retained in accordance with the law and the organization retention policy.

Billing

Baptist Senior Services is committed to full compliance with the specific billing and coding requirements of the Medicare and Medicaid programs and other third party payors, and outlines that procedure in its corporate compliance responsibilities policy # 118. Baptist Senior Services expects that all staff members, professionals, and contractors are familiar with these requirements, and employs oversight mechanisms for all billing services. To assure that Baptist Senior Services is billing Medicare properly, the organization periodically conducts an audit of its claims, either directly or through an outside consultant.

Baptist Senior Services recognizes that current law requires health care providers to report and return identified governmental overpayments within the later of: (a) sixty (60) days after identification; or (b) the date the cost report for the fiscal period at issue is due. Baptist Senior Services shall conduct any investigation of suspected misconduct with this obligation in mind, and should credible evidence of misconduct be discovered, the Corporate Compliance Officer shall confer with Counsel to discuss the method and means of complying with its governmental reporting and refund obligations.

7. Human Resources

Controlled Substances

The use, sale, or possession of controlled substances or alcohol on Baptist Senior Services property is strictly prohibited, except as normal course of business, such as authorized sale of alcoholic beverages through Dining Services.

Criminal Background Checks

Baptist Senior Services shall comply with the requirements of the Pennsylvania Older Adults Protective Services Act, 35 P.S. § 10225.101 et seq. ("OAPSA"), as well as the provisions of the Elder Justice Act contained within the Patient Protection and Affordable Care Act, Pub. L. 111-148, 124 Stat. 199 ("EJA"). To this end, Baptist Senior Services shall consider the nature of the offense, the circumstances surrounding the conviction, and the amount of time it has been since the offense occurred before hiring an applicant, or retaining an employee required to submit information under the OAPSA, or who has committed any of the offenses listed within the OAPSA or violated the reporting requirements of the EJA. Baptist Senior Services already has policies and procedures regarding the application and hiring process to comply with the requirements of the OAPSA and the EJA, and their successor provisions. Categories of criminal offenses covered by the OAPSA include but are not limited to:

- Criminal Homicide
- Unlawful Restraint
- Involuntary Deviate Sexual Intercourse
- Indecent Assault
- Burglary
- Forgery
- Concealing Death of a Child
- Intimidation of Witnesses or Victims
- Incest
- Felony Under Controlled Substance, Drug, Device & Cosmetic Act
- Aggravated Assault
- Rape
- Sexual Assault
- Indecent Exposure
- Robbery
- Securing Execution of Documents by Deception
- Endangering Welfare of Children
- Retaliation Against Witness or Victim
- Corruption of Minors
- Organized Retail Theft
- Kidnapping
- Statutory Sexual Assault
- Aggravated Indecent Assault
- Arson & Related Offenses
- Theft & Related Offenses
- Obscene & Other Sexual Materials and Performances
- Dealing in Infant Children
- Prostitution & Related Offenses
- Sexual Abuse of Children

Baptist Senior Services shall remove any person in a position of authority where there is credible evidence that the person is not willing or is unable to comply with this Plan. Baptist Senior Services retains the right to discipline Baptist Senior Services' employees or agents who are convicted of crimes or are excluded from participation in federal programs, including immediate removal from direct responsibility or involvement in any federally funded health care program and termination of employment. Consistent with the Department of Human Service's requirements for Medical Assistance providers, Baptist Senior Services will check available public sources, including, but not limited to, the Pennsylvania Medichex List maintained by DHS and the List of Excluded Individuals/Entities maintained by the Office of the Inspector General of the Department of Health and Human Services, and www.sam.gov on a monthly basis to verify the participation/exclusion status of employees, vendors, contractors, service providers and referral sources. Baptist Senior Services shall implement procedures to remove from direct responsibility or involvement in any federally funded health care program any Baptist Senior Services' employee or agent with pending criminal charges relating to health care or proposed exclusion from participation in federally funded health care programs.

Any employee who is arrested and/or notified of charges, or convicted of any violation of the law is required to report (verbally and in writing) such arrest or conviction within five (5) calendar days to his/her Department Director and the HR Director.

Occupational Health and Safety Act (OSHA)

The Occupational Safety and Health Act (OSHA) requires employers to provide a work environment that meets certain safety and health standards. Baptist Senior Services takes this responsibility seriously. We provide periodic education programs addressing the requirements of OSHA and the Baptist Senior Services' Safety Program. Staff members are required to comply with established facility policies and procedures designed to meet these guidelines. A staff member who identifies a known or suspected workplace hazard must report it immediately to his/her supervisor.

Sexual and Other Forms of Harassment

Baptist Senior Services is committed to maintaining a professional work environment that is free from sexual and other illegal harassment, which can include harassment based on race, color, religion, sex, sexual orientation, national origin, age, disability, or any other classification protected by law. Any illegal harassment of any individual by staff, Board, physicians, contractors, and vendors is prohibited and will not be tolerated. Sexual harassment consists of both direct and indirect actions that create a hostile work environment.

8. Other Legal and Regulatory Requirements

Baptist Senior Services complies with all laws and regulations that apply to our business, and will not knowingly take action in violation of these or any other applicable laws.

Political Advocacy

Baptist Senior Services encourages staff members to take an active interest in political affairs, but political activities must not be conducted on the organization's time or premises. Staff members may not identify themselves as representatives of the organization in any political activity or in any contact with the news media that is not sanctioned by the organization.

Federal law strictly controls corporate involvement in the political process. For this reason, staff members are prohibited from making payments or loans, performing services, or furnishing anything of value to a political party or candidate in conjunction with their positions with Baptist Senior Services.

Compliance with Copyright Laws

It is our policy to comply with copyright laws and other restrictions pertaining to the copying and dissemination of material contained in books, newsletters, and other periodicals.

The use of the computer software owned by the organization is limited by software licensing and copyright restrictions. Unauthorized use or copying of software is strictly prohibited.

Employment of or Contracting with Sanctioned Individuals

Baptist Senior Services does not employ, contract with, or accept as a member of its Board or professional staff an individual or entity who is ineligible for participation in federal healthcare programs, including Medicare and Medicaid. Baptist Senior Services verifies that the individual or entity's name is not included in the database of sanctioned individuals maintained by the Office of Inspector General of the Department of Health and Human Services, the General Services Administration, or by the Department of Human Services.

Non-Discrimination

Baptist Senior Services does not permit or tolerate any admission or employment decision or other discrimination based on race, color, religion, ancestry, national origin, age, gender, sexual orientation, or marital, familial, or disability status, or status as a covered veteran, or any other legally protected group status.

Referrals

The "Anti-Kickback Statute" and the Stark Law represent federal laws which basically prohibit the offer or receipt of anything of value in exchange for a referral for a service that may be paid for by the Medicare or Medicaid programs. Baptist Senior Services does not pay or accept payment from anyone (staff members, physicians, hospices, hospitals, or other healthcare providers) for referrals. Likewise, Baptist Senior Services does not provide non-cash benefits (such as office space or support personnel) to any physician or other healthcare professional in exchange for referrals.

False Claims Act

The False Claims Act makes it illegal for any person to, among other things, knowingly present, or cause to be presented, to an officer or employee of the Federal government, a false or fraudulent claim for payment or approval, or make, use, or cause to be made or used, a false record or statement to get a false or fraudulent claim paid or approved by the government. This act defines knowingly to mean that a person (a) has actual knowledge of the information; (b) acts in deliberate ignorance of the truth or falsity of the information; or (c) recklessly disregards the truth or falsity of the information. False claims against the government carry both financial and criminal penalties. Baptist Homes Society has implemented policies to address its billing obligations in order to avoid violation of the False Claims Act.

Program Fraud Civil Remedies Act

This act allows the Department of Health and Human Services, and other federal agencies, to impose an administrative penalty upon individuals and entities who submit a false claim or series of claims with a value of less than \$150,000.

Medicaid Fraud and Abuse Control Act

This act has both civil and criminal penalties, and makes it unlawful to submit false or fraudulent claims to the Medical Assistance program. The Pennsylvania Insurance Fraud law makes it a criminal offense to knowingly submit any false, incomplete, or misleading information concerning any material fact to an insurer or self-insured.

C. Reporting Compliance-Related Concerns and Questions

1. Types of Issues to Report

Baptist Senior Services requires staff members, Board members, physicians, contractors, and vendors to report any known or suspected violations of the law, our Code of Ethics, or related policies and procedures. Examples of compliance-related concerns, while not inclusive, can include:

- Known or suspected violations of legal or regulatory requirements, Baptist Senior Services' Code of Ethics, or organizational policies and procedures;
- The loss or suspension of a staff member or contractor's clinical or professional license;
- A staff or Board member, contractor, or vendor receiving notice of exclusion from participation in the Medicare or Medicaid programs;
- A staff member's arrest and/or notification of charges, or conviction for violating any law (excluding minor traffic citations).
- Suspected abuse or neglect of a Baptist Homes Society resident, or a reasonable suspicion that a crime has been committed against such resident.

2. Reporting Procedure and Compliance Hotline

Concerns can be reported in person to a Supervisor, Department Director, Executive Director, President & CEO or Corporate Compliance Officer via the confidential compliance hotline telephone number (412) 572-8360. This number rings directly to a private voice mailbox that is only accessed by the Compliance Officer (or a temporary designee appointed by the President & CEO). Callers to the hotline have the option of remaining anonymous, although that could, in some cases, limit our ability to conduct a thorough investigation of the concern.

3. Investigation and Follow-Up Action

All reports of compliance concerns or questions are promptly documented, reviewed, and investigated by the Compliance Officer, or designee, in accordance with organization policy. The Compliance Officer will involve the President & CEO, Risk Management Committee, Board of Directors, and/or legal counsel, as appropriate, to achieve a satisfactory resolution, including implementing corrective action when indicated. Baptist Senior Services will respond appropriately to any legal or regulatory violation and will take action to prevent future occurrences of the violation. Baptist Senior Services' employees and agents shall cooperate fully with any investigation undertaken by the Compliance Officer, the designee and/or legal counsel.

4. Non-Retaliation Policy

Open communication is essential to the success of the compliance program. Baptist Senior Services will not enact, permit, or tolerate any form of retaliation against any individual who reports a compliance-related concern or question. A staff member who is involved in

wrongdoing and reports it may be subject to disciplinary action for his/her own wrongdoing, although his/her forthrightness will be taken into consideration as the matter is investigated.

D. Disciplinary Action

Baptist Senior Services' staff members, Board members, physicians, contractors, and vendors are responsible for reporting known or suspected violations of the standard and for cooperating with compliance investigations. Failure to do so results in disciplinary action up to and including termination of the employment or business relationship, depending on the circumstances of a particular violation.

Any Baptist Senior Services employee accused of misconduct is given notice of the allegations, and the opportunity to respond to those allegations. Disciplinary action, as appropriate, is taken on a fair and equitable basis. An individual who deliberately makes a false accusation with the purpose of harming or retaliating against a colleague is subject to disciplinary action.

E. Education and Training

1. Initial Training and Certification

All staff members are trained on the requirements of the compliance program at the time of hire. Staff members are required to acknowledge, in writing, that adherence to program requirements (as well as periodic revisions or updates) is a condition of their continued employment with Baptist Senior Services. Through the Risk Management Committee, all Board members, physicians, and selected contractors and vendors receive a copy of the corporate compliance plan, and related revisions and education, as appropriate.

2. Ongoing Training and Education

Departmental and facility-wide education which addresses the requirements of the compliance program and key areas of legal and regulatory compliance is provided on an ongoing basis, and participation is documented. Education is provided via in-service programs, written articles, attendance at an outside educational seminar, or other means. Emphasis is given to education and training for staff who are responsible for key compliance areas including resident care, coding, billing, marketing, and admissions.

The Risk Management Committee ensures that the organization has copies of the regulations and laws which apply to the Baptist Senior Services. The Compliance Officer is responsible for sharing information about new legal and regulatory requirements with Department Directors.

Department Directors are responsible for educating staff within their departments about the Baptist Senior Services' Code of Ethics, compliance program guidelines, legal and regulatory requirements, and policies and procedures that apply to their particular job responsibilities.

F. Auditing and Monitoring

1. Monitoring the Corporate Compliance Program

The Baptist Senior Services' Quality Assurance Performance Improvement (QAPI) program regularly monitors and reviews all legal requirements related to organization operations. The Corporate Compliance Officer and the Risk Management Committee monitor the implementation of the compliance program, and through the QAPI process, provide regular progress reports to senior management and the Board of Directors.

2. Compliance Audits

Auditing systems designed to prevent problems and monitor compliance in key legal and regulatory areas are an important element of an effective compliance program. Compliance audits include, but are not limited to, the Baptist Senior Services' QAPI program, PEPPER Reports, mock surveys, organization policies and procedures, CMS Quality Indicator Reports, new employee competency evaluations, billing, and audits conducted by external consultants to evaluate regulatory and legal compliance or other elements of the compliance program.

3. Compliance as an Element of Performance Evaluation

All Baptist Senior Services staff members will adhere to legal and regulatory requirements and the requirements of the Baptist Senior Services' compliance program. Compliance with these requirements is evaluated in conjunction with the performance appraisal for each staff member. Additionally, Department Directors and other managers will communicate legal, regulatory, and compliance program requirements to the staff in their departments, and provide related training to reinforce understanding. Performance appraisals for Department Directors and managers include evaluation of their performance in these areas.

4. Facility Reports to Risk Management Committee

Each Baptist Homes Society Facility shall submit a report to the Corporate Compliance Officer on an occurrence basis when any of the following occur:

- Areas of compliance concern and how they are being addressed.
- Any incidences of intentional or accidental compliance-related misconduct within the Facility.
- Any compliance-related disciplinary action taken against Baptist Homes Society employees within the Facility.
- Any other matter dealing with compliance issues within the Facility.



**Corporate Compliance Program
Certification Form**

I have received a copy of the Baptist Senior Services Corporate Compliance Plan, and I understand the contents as they apply to my position or business relationship with the organization. I understand that I should consult the Corporate Compliance Officer directly or on the compliance hotline (412-572-8360) with any compliance related questions or concerns.

I understand that violation of the Baptist Senior Services' Code of Ethics, compliance guidelines, or other facility policies may be cause for disciplinary action up to and including termination of my employment or business relationship with the organization.

I certify that I am in complete compliance with the Code of Ethics and compliance guidelines as they apply to my position or business relationship with Baptist Senior Services, and I agree to continue to comply with these requirements in the performance of my duties.

I certify that I have not been excluded from participation in Medicare, Medicaid, or any other federal healthcare program(s).

I certify that I have not been convicted of a criminal offense in the categories covered by this plan.

I understand if I am arrested and/or notified of charges, or convicted of any violation of the law, I am required to report (verbally and in writing) such arrest or conviction within five (5) calendar days to my Department Director and the HR Director.

Name (please print) _____

Position or Business Relationship _____
(Board member, staff, physician, vendor, etc.)

Organization (if other than Baptist Senior Services) _____

Facility (please check) Baptist Homes Providence Point
 Corporate Services

Signature _____ Date _____

Distribution: Employee Personnel File or Board, Contractor, or Vendor File