



October 2024

Dear Vendor/Contractor/Physician/Service Provider:

It is the obligation of Saint Joseph Villa to annually inform those with whom we do business of a variety of regulations and policies that require your attention. This letter is to inform you of those obligations and remind you that we encourage your feedback.

Compliance Program: Saint Joseph Villa has a compliance program. A core document of any compliance program is the Code of Conduct which covers the compliance issues, laws and regulations and guidelines that are relevant to providers of senior services. This Code of Conduct is relevant to all individuals, including employees, contractors, volunteers, directors and officers.

Attached you will find a summary of our Code of Conduct, the full document can be viewed on our web site: stjosephvilla.org. Please assure that you review your obligation to abide by our compliance program as a requirement of doing business with Saint Joseph Villa.

Any questions on our compliance program should be forwarded to:

Sarah Schempp, Compliance Official 267-447-7994
schempps@stjosephvilla.org

You are encouraged to communicate any compliance concern to our Compliance Officer or if you, or one of your staff members, prefer to report a compliance concern anonymously, please use the Compliance Hotline. The compliance hotline phone # is printed on the attached brochure.

Excluded Provider Policies: Saint Joseph Villa cannot do business with any individuals or entities sanctioned by the Federal and State Government. It is your duty to inform us immediately if your organization or anyone under your employment is currently or becomes excluded in the future.

Any questions about exclusions should be forwarded to:

Sarah Schempp, Compliance Official 267-447-7994
schempps@stjosephvilla.org

Elder Justice Act: Under this regulation 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, their reasonable suspicion of crimes committed against nursing home residents. This reporting must happen in a timely manner.

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 to inform all of your employees who, in the course of business, are present on our community's campus, are aware of these obligations.

Deficit Reduction Act (DRA): Saint Joseph Villa is committed to ethical, honest billing practices and expects every team member (including employee's independent contractors, subcontractors and vendors) 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 “Qui Tam” or “Whistleblower” Protections (31 U.S.C. § 3730)

If you have questions about billing practices please contact:

Nancy Mandes, CPA

215-836-3525

MandesN@stjosephvilla.org

Please contact us if you have any questions. We look forward to our continued partnership.

Sincerely,

S. Irene Dunn, SSJ

President

Katrina Kane Wise, MBA, NHA

Executive Director