

Grasmere Place

Compliance and Ethics Program

Physician and Vendor Information

Grasmere Place's mission statement and values state that we will enrich the lives of the individuals who live and work with us, accept accountability, and build trust by acting with integrity. Our Compliance and Ethics Program has been developed to ensure that state and federal reimbursement, regulatory, and clinical guidelines are an integral part of our daily process.

Physicians and Vendors

Grasmere Place is committed to delivering high quality care and services to its residents, providing a caring environment and maintaining a positive and professional culture within the facility and with others with whom Grasmere Place conducts business.

Grasmere Place's website (www.grasmereplace.com) provides important information to our residents and their families, as well as employees, physicians, suppliers, contractors and health care professionals (vendors).

Physicians and vendors who provide health or personal care services to our residents or participate in federal or state health care programs must provide assurances of compliance with Grasmere Place's Compliance and Ethics Program by reviewing this document or acknowledging that they have implemented their own comparable compliance program. Any questions regarding physician or vendor clearance should be directed to the Administrator.

Grasmere Place's Compliance and Ethics Program

Our Code of Conduct provides practical guidelines for activities and interactions as well as methods to obtain answers to questions that arise. Physicians and vendors are expected to abide by the Code when conducting business and interacting with Grasmere Place and our residents.

Fraud, Waste and Abuse

We do not tolerate any practice that contributes to fraud, waste or abuse in the federal or state health care programs or private payer systems. Physicians and vendors must be aware of the federal and state laws, rules, and regulations designed to combat fraud and govern their actions and behaviors accordingly.

Deficit Reduction Act, Federal and State False Claims Act

The federal False Claims Act (FCA) protects government programs, including Medicare, Medicaid, and Tricare, from fraud and abuse. The Federal Deficit Reduction Act (DRA) provides state and financial incentives for enacting state false claims laws to protect the Medicaid programs from fraud and abuse. The primary activities that constitute violations under the FCA are: (i) knowingly present, or cause to be presented, a false or fraudulent claim for payment or approval; (ii) conspire to commit a violation of any of certain provisions of the FCA. The FCA provides administrative remedies for false claims and statements, state laws pertaining to civil or criminal penalties for false claims and statements, and whistle blower protections under such laws.

Anti-kickback Statute

The federal anti-kickback statute makes it illegal to knowingly and willfully solicit or receive any remuneration in return for referring an individual to a person or entity for the furnishing of any item or service for which payment may be made in whole or in part under a federal health care program. Most states have enacted similar state law. Physicians and vendors shall not offer or give to any Grasmere Place staff an improper or illegal gift, inducement, or referral, including meals and entertainment that may violate federal or state law or give the appearance of impropriety.

Stark Law/Conflicts of Interest

The Stark law prohibits a physician from referring patients to an organization with which the physician or the physician's immediate family member has a "financial relationship" for the furnishing of certain designated health services ("DHS") reimbursable by Medicare or Medicaid.

Grasmere Place prohibits relationships with physicians and vendors, financial or otherwise, that may cause conflicts of interest, perceived or real. Physicians and vendors must immediately disclose any conflicts of interest to the Administrator or the Compliance Hotline (877-772-6744).

Exclusion Screening

Grasmere Place prohibits the engagement of physicians, vendors and vendor personnel that have been excluded or are otherwise ineligible for participation in federally-funded health care programs. Should a physician, vendor or vendor personnel become excluded or sanctioned under any applicable federal or state fraud and abuse statutes, the physician or vendor agrees to immediately notify the Administrator or the Compliance Hotline (877-772-6744).

Elder Justice Act

The Elder Justice Act imposes a federal duty to report reasonable suspicions of crimes against residents of skilled nursing facilities to the Secretary of Health and Human Services and local law enforcement. When applicable, a physician or vendor must make this information available to its personnel and subcontractors working at Grasmere Place so that their staff are aware of the obligation to immediately report any suspicions of crimes to the Administrator or the Compliance Hotline (877-772-6744).

Resident Information Privacy and Security

Grasmere Place is committed to protecting the personal information of residents. This information can be medical, financial, or personal in nature. Physicians and vendors also have a responsibility to protect and secure resident personal information and ensure that any information is used, disclosed, stored, and transmitted in a proper and legal manner consistent with the law and company policy.

HIPAA regulates the protection of patient health information. In addition, the states have adopted privacy and breach laws. Physicians and vendors must be vigilant in making sure uses and disclosures are for legitimate business purposes and in compliance with applicable law. If a business associate relationship exists, the physician or vendor shall enter into a business associate agreement.

Gifts, Meals, and Entertainment

Grasmere Place staff are prohibited from offering, giving, accepting, or receiving improper or illegal gifts, inducements, or referrals including meals and entertainment that may violate federal or state law or give the appearance of an impropriety. To that end, physicians and vendors must understand and agree to abide by our policy.

Education and Training

Grasmere Place has Compliance and Ethics reference materials available to physicians and vendors at www.grasmereplace.com, which also includes a link to resources offering fraud, waste and abuse training and HIPAA training.

Responsibility to Report/Non-Retaliation

Physicians and vendors must be aware of the responsibility to report any known or suspected violation of the Code of Conduct and instances of questionable conduct, practices, or wrongdoing. As feasible or to the extent possible, these reports will be kept anonymous. In addition, physicians and vendors will not be subject to any reprisal for a good faith report of a suspected violation of the Code of Conduct or other compliance or ethics matters.

Contact Information

If a physician or vendor has a concern about a Grasmere Place practices or knows of or suspects a violation, the physician or vendor must report the information to the Grasmere Place Administrator (the Compliance Officer) for further investigation. If you are not comfortable reporting the information to the Administrator, please make a report via the Hotline.

Compliance and Ethics Hotline

877-772-6744

Grasmere Place Administrator

773-334-6601

Grasmere Place

4621 North Sheridan Road

Chicago, Illinois 60640