



front porch

Compliance Program

For additional information contact:
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(818) 729-8184

Front Porch

303 N. Glenoaks Blvd., Ste. 1000
Burbank, CA 91502



Compliance Program

CORPORATE COMPLIANCE COMMITTEE

Committee members as of October 2011:

Terry Bluemer	Sr. Vice President, Organizational Accountability Group
Joe Butler	Corporate Counsel
Desiree Burton	Sr. Vice President, Human Resources
Jeff Kirschner	Operations, Divisional Vice President
Scott Staehling	Executive Director, Fredericka Manor
Sam Bergstrom	Administrator, Fredericka Manor Care Center
Dawn Cairns	Director, Quality Assurance
Debbie Rompal	Vice President, Financial Services/Corporate Controller
Rachel Taylor	Financial Services Project Manager

Representatives from the above departments would provide necessary expertise to assist the Corporate Compliance Officer in the development and implementation of an effective Corporate Compliance Program.

The role of the Committee would be to advise the Compliance Officer on the work of the committee, provide expertise for adoption of policies and procedures, assist with communication of the Corporate Compliance Program, assist with implementation of the monitoring and auditing functions, and provide training to their staff members in meeting the requirements of Corporate Compliance.

The Committee's role may change from time to time as is necessary for effective development and implementation of the Corporate Compliance Program.



Compliance Program

Office of Inspector General Nursing Home Guidelines

Elements of Effective Program

- 1) Implementing written policies, procedures and standards of conduct.
- 2) Designating a compliance officer and compliance committee
- 3) Conducting effective training and education
- 4) Developing effective lines of communication.

Front Porch Action and Documentation

Established code of conduct, education and training guidelines, disciplinary guidelines

Compliance officer and committee designated

Training to be provided by each location – consistent with the training guideline and reported to compliance officer
Training conducted after each internal and external assessment by Burbank accounting trainer and compliance officer

Code of Conduct and Compliance Report forms posted at each location
Code of Conduct signed at orientation and annually. Communication through periodic meetings and e-mail

Employee Code of Conduct

As employees of Front Porch, we strive toward excellence in our work every day. As a foundation to our work and obligation to those we serve, we commit to a code of conduct that requires the highest regard for ethical behavior. Front Porch has an active compliance program that ensures that we understand our requirements including a commitment to the following code. For more information on Front Porch Compliance Program, please contact Terry Bluemer at 800-233-3709 or TBLUEMER@FRONTPORCH.NET.

We strive to deliver quality health and human services

- ◆ We ensure residents' rights and dignity.
- ◆ We employ or work with persons with proper credentials, experience and expertise.
- ◆ A problem, deficiency or error must be brought to the attention of those who can properly assess and resolve the problem.

We comply with all applicable laws, regulations, standards and other requirements imposed by any level of government.

- ◆ We comply with all requirements of the Medicare and Medicaid program.
- ◆ We will not engage in any business or marketing practices or relationships that involve unethical or illegal activities.
- ◆ We will bill only for services actually rendered and which are fully documented in the residents' records. If the services must be coded, then only billing codes that accurately describe the services provided will be used.
- ◆ We will not submit claims for payment or reimbursement of any kind that are false, fraudulent, inaccurate or fictitious. No falsification of medical, time or other records that are used for the basis of submitting claims will be tolerated.

We avoid conflicts of interest and appearances of impropriety.

- ◆ We do not become involved in outside activities that could improperly influence our actions or be perceived as a conflict of interest with our duties.

We protect the property rights of residents and Front Porch.

- ◆ We may not use Front Porch's or residents' resources or property for personal or improper use, or permit others to do so.
- ◆ We may only use computer systems, networks and software programs consistent with Front Porch's license and/or rights. We take all reasonable steps to protect computer systems and software from unauthorized access or intrusion.
- ◆ We protect confidential and proprietary information of Front Porch, its residents and employees from unauthorized use.

We treat each other with respect, dignity and integrity.

- ◆ Discriminatory treatment, harassment, abuse, intimidation, fraud or waste will not be tolerated.

We promptly report all suspected violations of this Code of Conduct, compliance guidelines, operational and human resource policies, laws and regulations. Investigation of reported violations will begin within 14 days of report. There will be no reprisal nor retaliation for reporting a suspected violation.



FALSE CLAIMS ACT: POLICY AND PROCEDURE FOR DETECTING AND PREVENTING WASTE, FRAUD AND ABUSE

Front Porch will not submit or cause to be submitted false claims. Furthermore, employees of Front Porch can be held liable for filing or causing to be filed false claims. Front Porch strictly prohibits the submission or participation in the submission of any false claims.

The Federal False Claims Act (FCA) outlines the liability for individuals who file or cause to be filed false or fraudulent claims. A false or fraudulent claim is basically something that is untrue. Billing twice for the same service, billing a higher level of service when a lower level was provided, unbundling of charges, billing for equipment or supplies that were never provided, providing misleading information on MDS, recording information in the medical record that is not accurate, etc....these are all examples of false claims. In addition, the State of California also has its own False Claims Act which is very similar to the Federal FCA. Violations to the Federal FCA come with civil penalties of not less than \$5,500 and not more than \$11,000. Fines may also include treble damages up to three times the amount of the original penalty and the violator can be excluded from participating in the Medicare and Medi-Cal programs.

Front Porch has implemented policies and procedures to prevent the filing of false claims and has established a confidential disclosure program for employees to report suspected false claims directly to the Compliance Officer. If you know of or suspect that false claims are being filed, you are required to report this to the Compliance Officer. All employees are required to attend mandatory compliance training upon hire and annually thereafter.

The federal and state False Claims Acts also have what is known as "whistleblower protections." Individuals with specific knowledge of false claims submissions have the right to file a claim and will be protected under both the Federal and State False Claims Act for doing so. Under Front Porch's **Compliance Program**, employees are required to report suspected or known violations to the Compliance Officer or to another member of management.

Compliance Officer:	Terry Bluemer
Mail:	Front Porch 303 N. Glenoaks Blvd., Ste. 1000 Burbank, CA 91502
Phone:	(818) 729-8139
Email:	tbluemer@frontporch.net

I have read Front Porch's *Code of Conduct* and *False Claims Policy* written above. I agree, as a condition of employment, to fully support and comply with all of these policies and codes of conduct. I understand that these policies and codes of conduct may be modified from time to time and I will fully support and comply with the codes of conduct as modified. I know that I may report any violations of these codes to the Corporate Compliance Officer without any fear of reprisal.

Employee's Signature

Date

Print Name



Compliance Program

Corporate Compliance Training Guidelines

ROUTINE TRAINING TOPIC	PERSONS TO ATTEND	FREQUENCY OF TRAINING	RESPONSIBILITY
Resident Rights	Care Center, Assisted Living, RCFE	Orientation & Annually	Exec. Dir./Admin./Dept. Mgr.
Elder Abuse Prevention & Reporting Requirements	Burbank staff- Orientation only Care Center, Assisted Living, RCFE Burbank, CHM	Orientation & Annually Orientation	Exec. Dir./Admin./Dept. Mgr.
Preservation of Resident Dignity & Privacy	Care Center, Assisted Living, RCFE Burbank, England Oaks, Cecil Pines	Orientation & Annually Orientation	Exec. Dir./Admin./Dept. Mgr.
Code of Conduct	All	Orientation & Annually	H.R. & Dept. Mgrs.

ROUTINE TRAINING TOPIC	PERSONS TO ATTEND	FREQUENCY OF TRAINING	RESPONSIBILITY
Medicare/Medi-Cal Billing Procedures & Proper Auditing	Billing Coordinators for Corporate & Care Center, Executive Directors/Administrators	Orientation and As Needed	Burbank Accounting/Compliance Committee
Preventing Kickbacks, Inducements & Self-Referrals	All Executive Staff	Orientation and As Needed	Compliance Officer
Quality of Care Requirements	Executive Directors Administrators, Nursing Staff	As Needed	Director, Quality Assurance
Affordable Housing – Leasing and House Rules	Housing Managers	Annually	CHM- Corporate Management
Computer Privacy & Security Practices	All new computer users	Orientation	Information Technology Dept.
Conflict of Interest (any gift share w/comm..)	Dept. Mgr. & Others Involved in Purchasing	Orientation & Annually	Exec. Dir.
Sexual Harrassment	All those with Supervisory Responsibility	Within 6 months of employment & every 2 years	HR - Burbank



Compliance Program

Employee Disciplinary Guideline

The disciplinary guideline applies to Front Porch employees, including officers, managers, supervisors and other staff. The intent of disciplinary action is to correct performance, violations of policy, procedure, or law.

“All employees are expected to know, understand and adhere to the Code of Conduct and Compliance Policies, in addition to all other policies, procedures and guidelines issued by the Organization. Employees must also adhere to applicable local, state and federal laws.”

Employees of Front Porch are expected to follow all work rules, standards of performance, comply with training requirements and satisfactorily perform his/her job duties. Failure to do so may result in disciplinary action up to and including termination.

Generally, Disciplinary, corrective action may include one or all of the following: Verbal and/or written warning, corrective action plan, demotion, suspension or termination. Front Porch reserves the right to determine in its sole discretion and judgement, the nature and level of discipline depending on the severity of the circumstance. This guideline is **not** a guarantee of progressive discipline, and Front Porch reserves the right to terminate any employee at any time, for any lawful reason, with or without notice.

Disciplinary action may be taken with a manager or supervisor to the extent that the circumstances of the violation reflect inadequate leadership or lack of diligence.