

Vendors

Dear Vendor/Contractor/Physician/Service Provider:

Lebanon Valley Brethren Home, doing business as Londonderry Village, is committed to ethical, honest billing practices and expects every team member (including employees, independent contractors, subcontractors and vendors) to be vigilant in maintaining these standards at all times. It is important that all team members, including contractors and vendors, 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 laws and regulations listed below.

Compliance Program: Londonderry Village has a Corporate Compliance and Ethics Program. Our Code of Conduct, which covers the compliance issues, laws, regulations, and guidelines that are relevant to providers of senior services, is the foundation document of our compliance program. The Code of Conduct is applicable to all team members including employees, contractors, vendors, volunteers, directors and officers.

The full Code of Conduct document can be viewed by clicking [here](#). Please assure that you review your obligation to abide by our compliance and ethics program as a requirement of doing business with Londonderry Village.

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

Elder Justice Act: Under this regulation it is the obligation of anyone who works for, or contracts with a long term care community(covered individual) to report to local law enforcement, and to the PA state survey agency, their reasonable suspicion of a crime committed against nursing home residents. This reporting must happen in a timely manner.

If the events that cause the reasonable suspicion of a crime:

- 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.

Report the Crime to:

- a. Local Law Enforcement: North Londonderry Police Dept. 717-838-5276
- b. State Survey Agency: PA Dept. of Health, Division of Nursing Care Facilities, Lehigh Valley Field Office at 610-861-2177

Penalties for failure to report:

- a. The covered individual shall be subject to civil money penalties of not more than \$200,000 for noncompliance.
- b. If the noncompliance “exacerbates the harm to the victim of the crime or results in harm to another individual,” the individual faces a maximum fine of \$300,000.
- c. An individual who is fined may be excluded from participation in any federal health care program (Medicare and Medical Assistance).
- d. A facility may be excluded from participation in any federal health care program if excluded individuals are found within their employees.

If the “suspicion of a crime” would involve potential abuse, neglect, misappropriation of property or exploitation, the covered individual must also report the matter to the Nursing Home Administrator and/or the Director of Nursing according to the facility’s Abuse and Neglect policy.

Londonderry Village will not retaliate against any individual who lawfully reports reasonable suspicion of a crime against a Resident. Please be sure to inform all of your employees who, in the course of business, are present on our campus, of these obligations.

You are encouraged to communicate any compliance concerns to our Compliance Officer. If you or one of your staff members prefer to report any compliance concern anonymously, please use the Compliance Hotline. The compliance hotline phone number is contained in our Code of Conduct.

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

Sincerely,

Londonderry Village