

GREENWOOD CONNECTIONS COMPLIANCE & ETHICS POLICY AND PROCEDURE

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GREENWOOD CONNECTIONS

COMPLIANCE & ETHICS POLICY AND PROCEDURE

Commitment to Greenwood Connections' Compliance and Ethics Program is mandatory and is a condition of employment and or working with or at Greenwood Connections in any capacity. Any staff member, service provider or business associate that has knowledge of or suspects in good faith a violation of the program is required to report such incidents to the Administrator or Governing Board in a timely manner. The Governing Board member names are located outside of the Greenwood Connections Business Office. If any staff member, service provider or business associate is found to have violated one or more of the terms of the program including, but not limited to , failing to report a known violation of the program, he or she may face disciplinary action up to and including termination of employment or relationship. Adherence to the Program may also be a factor in performance evaluation.

I. GREENWOOD CONNECTIONS MISSION AND VALUES:

Greenwood Connections is dedicated to providing services that assist each and every resident in attaining and maintaining his or her highest practicable physical, mental and psychosocial well-being and caring for the person holistically (physically, mentally, socially and spiritually). We are also dedicated to and are committing resources to promoting a cultural of ethical behavior and a commitment of compliance with the law and detecting and preventing wrong doing. Greenwood Connections holds it owners, operators, officers, managers, departments heads, employees, members of the medical staff, vendors, suppliers, independent contractors, service providers, business associates and volunteers to the highest ethical, legal and business standards in the performance of their respective duties. We demand honest, honorable and effective behavior from every member of our team and anyone associated with Greenwood Connections.

II. CODE OF CONDUCT:

Greenwood Connections has adopted the following code of conduct as part of the Quality Assurance Performance Improvement (QAPI) Program. The *Code* shall serve as foundational documents that detail the fundamental principles, ideals and framework for action within our organization. The purpose of the *Code* is to fulfill our mission and values by defining ethics and compliance standards and making it clear that we will not tolerate and permit employees, service providers or business associates to tolerate offenses and turn a blind eye. The purpose of the *Code* is also to be used a tool for training and to permit fair enforcement and discipline and to help ensure effective self-monitoring.

A. Compliance with the Law and the Program

As a means of ensuring the safety of residents and safeguarding the efficient use of tax payer funds, Federal, State and Local governments have enacted many regulations controlling nursing home operations. Certain federal and state laws are described in the training that is provided for all new staff and annual training of all staff. All scenarios and situations are not addressed in training so if there is ever a doubt, any situations can be discussed with direct supervisors or the administrator if necessary. **If you see something that does not seem right, say something.** Under no circumstances does the omission of a provision for not knowing excuse non-compliance. All personnel and those interacting

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with Greenwood Connections must obey all applicable federal, state and local laws and regulations. It is also extremely important that you are able to identify illicit activity conducted by others and that you appropriately report such activity immediately. The Code and Program are designed to help prevent and detect such violations and to provide avenues through which personnel can report violation that they witness or suspect in good faith, without fear of retribution. Violations of the law may be punishable by, among other things: financial penalties, elimination from health care programs and/or incarceration and/or by disciplinary action up to and including termination of employment or relationship. Compliance helps to demonstrate our commitment to providing residents with very high quality care and enhancing resident satisfaction and safety through the delivery of improved quality of care. Compliance improves Greenwood Connections' reputation for integrity and quality and increases its market competitiveness and reputation in the community. These are the reasons for strict compliance and full cooperation with the Code and the Program.

B. Transparency

Greenwood Connections wants to promote an environment of transparency. We are humans and we all make mistakes. It is only by analyzing our mistakes or near-mistakes that we will learn how to avoid similar errors in the future. We must first identify our mistakes in order to learn from them. The effectiveness of the Program relies on the participation and cooperation of all staff members coming forward with questions and concerns as well as reports of suspected and known illegal or unethical behavior. Greenwood Connections requires all of its personnel, including those working at or with the Facility in any capacity to be forthcoming when a mistake is realized or anticipated or a reportable event occurs.

C. No Retaliation

Greenwood Connections has a strict No Retaliation Policy, whereby staff members who report known or suspected violations of the Program or other illegal or unethical activity are protected from any intimidation, coercion, discrimination or any other form of retribution or adverse employment action for coming forward. All Greenwood Connections employees, service providers or business associates should therefore feel comfortable discussing and/or reporting any and all compliance or ethics related questions, comments and concerns, whether it relates to a past error, an ongoing occurrence or the anticipation of foul play. Staff members should speak freely if approached by an internal investigator or auditor relating to happenings in the facility. If for any reason you do not feel comfortable, you should report and explain the reason for your discomfort with reporting to the Administrator, Governing Board or Compliance Committee.

D. Good Faith Reporting

Greenwood Connections recognizes the potential for abuse of this system of reporting and particularly the risk that a vindictive and unethical person could attempt to hide behind the anonymity and security that the Program provides, to wrongfully and without basis inflict harm on others. Therefore, while we urge staff to share pertinent information with the appropriate personnel and err on the side of over-reporting, all reports, suspicions, concerns of compliance or ethical violations must be made in good

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faith. Anyone who abuses this process by submitting reports that are knowingly false or based on anything other than good faith threaten the integrity and effectiveness of this Program and may themselves be violating the law which may be punished accordingly including termination of employment or services.

E. Cooperation with Investigations

We strive to appropriately and orderly cooperate with government investigations with the least disruption to care at the Facility possible under the circumstances. Because complex issues of privacy, confidentiality, privilege, the right to counsel and/or retention of records often arise, personnel should refer all communications with law enforcement agencies and/or all requests for records to the Committee and Greenwood Connections' Administrator so all inquiries can be appropriately and timely addressed. Examples of investigations with which you may be faced include inquiries into possible Medicare or Medicaid fraud and abuse, inappropriate third-party billing or illegal kickbacks for patient referrals. The individuals who may approach you to conduct such investigations include members of an audit team auditors, Recovery Audit Program ("RAC") auditors, Medicare Administrative Contractor ("MAC") auditors); representatives of the state Attorney General's Office—including its Medicaid Fraud Control Unit; Investigators with the Office of the Inspector General; or law enforcement officials (i.e. Federal Bureau of Investigation ("FBI") or local police officers). If any staff member is approached by a law enforcement official or government representative or is presented with a search warrant or receives a subpoena or any similar form of investigative communication relating Greenwood Connections, its residents, its service providers, its business associates or its employees in any way – including notice of an in-person interview, deposition or interrogation or a demand for the immediate production or inspection of documents– the individual should politely inform such representative that he or she needs to contact the Committee and Greenwood Connections Administrator, who will properly assist Greenwood Connections in responding honestly, clearly and completely to the full extent of the law. The Committee, with the guidance of Greenwood Connections' legal counsel, will manage all responses and releases of information. All responses on behalf of Greenwood Connections should always be truthful and straightforward. Nothing in this policy is intended to prevent, obstruct, mislead or delay the proper communication of information or records to the appropriate authorities. Nor is this policy intended to prevent or discourage employees from properly participating in lawful investigations. Instead, with this policy, Greenwood Connections strives to ensure that all operative laws and regulations are dutifully followed, that all information is provided in an organized and forthright manner and that the rights of Greenwood Connections' residents, service providers, business associates and employees are duly protected.

F. Integrity of Program

Greenwood Connections has taken numerous steps to preserve the integrity of the Program. Some of these steps include: (i) the Administrator has authority of Ownership and Management to gain unrestricted access to all documents reasonably relevant to compliance activities; (ii) all personnel must cooperate fully with internal investigations and audits and to talk openly and honestly about compliance and ethics concerns to the Administrator or those acting on behalf of the Administrator; (iii) the

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Administrator and the Committee shall maintain the necessary independence to properly monitor the goings-on at Greenwood Connections at all levels; and (iv) there shall be periodic audits of the Program and those who administer it.

III. PROCEDURES AND STANDARDS:

A. Procedures

1. Distribution and Acknowledgment

The Administrator is responsible to distribute this Program to all personnel including service providers and business associates. The Administrator is encouraged to have all personnel to acknowledge receipt of the Program as well as personal responsibility for understanding and adhering to its guidelines. Such acknowledgement can be accomplished by submission to HR or the Administration by completing the Compliance and Ethics Receipt and Acknowledgment Form that accompanies the Policy.

2. Accessibility

The policy must be accessible to all personnel, as well as residents, residents' families, responsible parties and vendors. The policy will be posted in a conspicuous area of the facility and on the facility's website. The program/policy will be reviewed at the monthly QAPI meetings.

3. Training and Education

In addition to receiving and reviewing this policy, each new Greenwood Connections staff member must complete an initial training and receive policy and procedure prior to beginning orientation. Staff must complete an annual refresher course through EduCare. HR will be responsible for tracking compliance with the annual and initial training.

4. Compliance Reporting

You may always report any ethical or compliance violation through your ordinary chain of command, but if the response is unsatisfactory or circumstances do not allow you to follow the ordinary chain of command, you must report another way. Greenwood Connections has a Compliance & Ethics Committee which is chaired by the Administrator, whom is responsible for receiving, responding and overseeing all compliance and ethics issues. All Greenwood Connections employees, service providers, and business associates may contact the Administrator or any Compliance & Ethics Committee member either in person, in writing, or by telephone, with any compliance or ethics related questions, comments or concerns. Employees may also report using the Employee Compliance Reporting Box which is located by the time clock. Each employee will also be asked during online surveys 90 and 180 days from employment and annual surveys if they have any compliance concerns and this information will be followed up on by the Administrator and or compliance and ethics committee. Staff should answer these questions honestly with good faith and with no fear of retaliation.

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B. Standards

Greenwood Connections is committed to adhere to all operative federal, state and local laws, rules and regulation. Violations of laws are unacceptable, as is encouraging, directing, facilitating or permitting unlawful behavior.

1. Quality of Care

Clinically Driven Care

All decisions regarding resident care shall be driven by the honest assessment of each resident's clinical needs.

Residents' Rights

Personalized care and services is very important with Greenwood Connections objectives. Greenwood Connections sees to it that the Resident Bill of Rights is followed and adhered to.

Person-Centered Comprehensive Care Plans

Greenwood Connections shall develop person-centered comprehensive care plans for each resident that addresses his or her individual medical, nursing, mental and psychosocial needs, using among other things the Resident Assessment Instrument (RAI) which includes all disciplines involved in the resident's care and the residents and or the resident's representative. Care plans and other meetings will be documented to show attendance and assisting in establishing staff involvement in care.

Medication Management

Greenwood Connections shall obtain the services of a licensed pharmacist consultant to work with to achieve proper medication management. Ensuring compliance with operative quality and safety standards, including monitoring the prescription drugs prescribed to resident and keeping residents drug regimen free from unnecessary medications.

Psychotropic Drugs

Greenwood Connections must ensure that psychopharmacological practices are compliant with governmental regulations and generally accepted professional standards. For example, no medications- especially atypical antipsychotic medications- should be used as a means of chemical restraint for purposes of discipline or convenience.

Promoting Resident Safety

Residents have a legal right to be free from abuse and neglect under all circumstances. Residents are also entitled to be free from preventable adverse incidents and temporary harm events. Accordingly, Greenwood Connections shall take steps to ensure that it is protecting its residents from these risks. Of particular concern is harm caused by staff and fellow residents. Heightened awareness and monitoring for abuse and neglect are crucial to the success of our Program.

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Background Checks

Greenwood Connections shall not employ or contract with individuals found guilty of abusing, neglecting or mistreating residents or individuals with a finding entered into a state nurse aid registry concerning abuse, neglect, mistreatment of residents or misappropriation of residents' property. Furthermore, if an individual or entity contracts or does business with or is employed by an individual or entity that is excluded from participation in the Medicare or Medicaid programs – or a non-excluded entity which is controlled by an excluded individual – it may be subject to penalties. In light of the foregoing, background checks will be conducted on all personnel, specifically those who are licensed health care providers and those with direct resident access, as required under federal and state law. This is in addition to requiring all prospective employees to disclose any criminal convictions and/or exclusions from health care programs in their employment application. The background check, at the time of employment and periodically thereafter, may include searches of state and federal criminal history records, a review of the Office of Inspector General's List of Excluded Individuals/Entities and other recognized registries and methods of investigation such as fingerprint checks. Specifically, criminal background checks may be conducted annually and exclusion checks may be conducted monthly or more frequently as required by law or circumstances. Furthermore, all employees are required to inform Greenwood Connections if they become excluded, debarred, suspended or otherwise ineligible to participate in federal or commercial health care programs or if they are convicted of a crime while working at or with Greenwood Connections or if they become aware that another person or entity with whom Greenwood Connections conducts business is excluded or employs or contracts with excluded individuals or entities.

All service providers and business associates must conduct the background checks discussed above on all of their employees who work at or with Greenwood Connections in any capacity. Should a background check reveal that an individual or entity has been convicted of a felony or was excluded from participation in health care programs; Greenwood Connections shall refrain from employing or contracting with such individual or entity, at a minimum to the extent required by law. Furthermore, if such individual or entity is employed by or contracting with Greenwood Connections at the time such conviction or exclusion is discovered, Greenwood Connections will immediately work to determine the appropriate action based on the circumstances, including possible termination of the relationship and/or reversal of payment received for services rendered by the individual or entity while excluded.

Employee Qualifications

All Greenwood Connections personnel shall obtain and maintain proper credentials, certifications and licenses as required carrying out their respective jobs. In addition, all staff members should fulfill any applicable continuing education requirements. At a minimum, Greenwood Connections and any entity doing business with it in any capacity shall check qualifications as required by law.

Staffing

Staffing levels shall not fall below any applicable federal or state requirements. Greenwood Connections shall assess its staffing pattern regularly to evaluate whether it has sufficient staff members who are competent to care for the unique acuity levels of our residents. Assessment of staffing patterns

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should take into account resident case mix, staff skill levels, staff-to-resident ratios, staff turnover, staffing schedules, disciplinary records, payroll records, timesheets and adverse events reports (e.g. falls, adverse drug events, etc.), as well as interviews with staff, residents and/or residents' families/representatives or legal guardians.

2. Billing Practices

All staff members should be particularly cautious with the accuracy of billing information, as reckless misstatements to government agencies or other payers can result in criminal prosecution, forfeiture of reimbursement and/or the imposition of civil monetary penalties imposed against an individual and/or Greenwood Connections.

Accurate Documentation and Submission of Claims

Honesty and meticulousness in writing is just as important as it is in verbal communication. Greenwood Connections demands that all personnel, including anyone working at or with the Facility in any capacity, maintain the highest level of integrity regarding documentation by maintaining proper records in accordance with all relevant laws. Greenwood Connections strictly prohibits tainting the accuracy of medical, financial or billing records by, among other things, forging another's signature; back-dating; falsifying, misrepresenting, altering or exaggerating entries; or submitting a document that one has reason to believe is false, erroneous or inadequate. As an additional safeguard, Greenwood Connections may institute monitoring and auditing systems aimed at detecting inaccurate billing and reimbursements. Should any staff member discover a billing error – including but not limited to the receipt of an overpayment (an amount of money Greenwood Connections receives in excess of the amount due and payable under health care program requirements) – he or she should immediately advise a supervisor or a Committee member of the error to ensure that proper corrective action is taken.

General Billing Practices

Personnel must adhere to all operative laws, rules and regulations governing billing procedures, submission of reimbursement claims and filing of cost reports. Greenwood Connections must submit accurate claims and desires only to bill for services that were actually provided, medically necessary and properly authorized. As such, do not submit a false claim or cause a false claim to be submitted. By way of example, no member of our team, or anyone working at or with Greenwood Connections in any capacity, should: bill for items or services not rendered or provided as claimed; submit claims for equipment, medical supplies and services that are medically unnecessary; submit claims to Medicare Part A for residents who are not eligible for Part A coverage, particularly regarding hospice care; duplicate bill; fail to identify and refund credit balances; bill for unallowable claims related to communicable disease care; submit claims for items or services not ordered; knowingly bill for inadequate or substandard care; provide misleading information about a resident's medical condition on the MDS or otherwise provide inaccurate or incomplete information used to determine the Case Mix Group (CMG) assigned to the resident; improperly document or code to inflate the severity of CMG classifications and obtain additional reimbursement; over-utilize Medicare Part B services; up code the level of service provided; bill for individual items or services when they either are included in the

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Facility's per diem rate or are of the type of item or service that must be billed as a unit and may not be unbundled; bill residents for items or services that are included in the per diem rate or otherwise covered by a third-party payer; alter documentation or forge a physician's signature on documents used to verify the services were ordered; fail to maintain sufficient documentation to support the diagnosis, justify treatment, support the course of treatment and results and promote continued care; or create or submit false cost reports. Furthermore, Greenwood Connections will require the payment of insurance copayments and deductibles barring a determination that a resident lacks the funds for such payment or some other legitimate exception.

Restorative and Personal Care Services

Residents shall receive appropriate restorative and personal care services to allow residents to attain and maintain their highest practicable level of functioning. These services include, among others, care to avoid pressure ulcers, active and passive range of motion, ambulation, fall prevention, incontinence management, bathing, dressing and grooming activities. Health care programs may not reimburse for restorative and personal care services that were not provided or were so wholly deficient that they amounted to no care at all.

Documentation Retention

Greenwood Connections requires the retention of all generated and received recorded information – electronic and paper – related to financial, medical or legal issues for the applicable period required by law, if any. All records should be kept in their original form or a suitable alternative form for storage for the duration of the period, at which time such records should be destroyed. In the event a legal hold notice – requiring retention of certain records that may be relevant to matters that are the subject of litigation, investigations or audits – is issued, the terms of such notice should be carefully observed, superseding normal document retention practices.

Excluded Individuals/Entities

Greenwood Connections shall not employ, contract with or bill for services provided by individuals or entities excluded from participation in a federal, state or commercial health care program.

3. Kickbacks

The Anti-Kickback Statute is a criminal prohibition against remuneration (any form of payment, whether direct or indirect) made to induce or reward the referral or generation of health care program business. To that end, unless an exception or Safe Harbor applies, the acceptance, offer, payment or solicitation of money or anything else of value by, from or to any vendor, supplier or health care provider or beneficiary by, from or to a Greenwood Connections' staff member in exchange for any referral, recommendation or inducement of any business is strictly prohibited. Examples may include discounts, special deals, perks or gifts (i.e. free office space, commissions, expensive travel or entertainment arrangements, etc.). The offer to or acceptance from vendors of nominal gifts – such as inexpensive pens, small pads of paper or modest meals – in line with commonly accepted practices, may be acceptable when such gifts are not given or accepted for the purpose of inducing the referral or generation of business and such gifts do not create the appearance of impropriety. However,

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Greenwood Connections' personnel shall not offer or accept any tip or gift to or from any prospective or current resident or on behalf of any resident in any way related to health care services rendered or to be rendered. In addition, we request that personnel report any occurrence of a staff member being offered or accepting any free or non-fair market value goods or services from anyone with whom Greenwood Connections does or might do business, as such activity may create heightened risk. The Anti-Kickback Statute is an intent-based statute and is complex in nature. Staff members must seek guidance from a Committee member and/Administrator whenever the Anti-Kickback Statute is potentially implicated.

Anti-Supplementation

Greenwood Connections must accept the applicable Medicare or Medicaid payment (including any beneficiary co-payment authorized under those programs), respectively, for covered items and services as the complete payment and may not charge the beneficiary, or any other person, any amount in addition to what is otherwise required to be paid under those programs.

Fair Competition

While we strive for excellence in the industry, we do so only while competing fairly with others. Determination to succeed does not excuse unfair competition. Greenwood Connections is committed to carrying on its business within the parameters of relevant regulations and proper practices. As such, Greenwood Connections forbids the engagement in any activity that produces monopolies or suppresses competition. We ban the use or sharing of proprietary or confidential information from or with competitors, as well as the utilization of deceptive or illegal means to obtain classified information. It is likewise prohibited to violate trademarks or other intellectual property rights (e.g. copyrights, patents and service marks) of others.

No Discrimination

Respect for the dignity of others is the guiding principal for our professional relationships. Do not discriminate in admissions, retention, treatment or employment decisions based on race, color, religion, sex, national origin or any other characteristic prohibited by law or engage in sex based wage discrimination or discrimination against qualified individuals with disabilities or discriminate in employment based upon genetic information about an applicant, employee or former employee.

Advertising and Marketing

The content and dissemination of advertising and marketing materials and compensation arrangements for marketers and sales representatives shall accord with any and all relevant laws, rules and regulations. Specifically, all advertising shall be distributed in a manner that abides by HIPAA privacy rules. And compensation arrangements for marketers and sales representatives shall steer clear of potential issues of fraud, waste and kickbacks.

Conflicts of Interest

Greenwood Connections' interests must supersede all personal interests in our staff members' actions in their professional capacity. Personal interests must not interfere with Greenwood Connections' interests in any way. Therefore, all Greenwood Connections personnel must disclose existing potential and perceived conflicts of interest – including their or their family member's or close friend's

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participation or ownership in or employment with any contractor or party with which the Facility does business or conducting outside business other than that which is being done on behalf of the Facility with any of its vendors, suppliers or contractors, or any of their officers or employees – and avoid entering into any relationship that may compromise their responsibility to Greenwood Connections going forward. Those staff members who work regularly with third parties on Greenwood Connections' behalf should report any actual or potential conflicts of interest on no less than an annual basis or whenever the conflict first arises.

Proprietary, Privileged and Confidential Information

Disclosure or sharing of proprietary, privileged and/or confidential information – including health information, personal data and classified business records – is strictly regulated. Greenwood Connections' personnel, including anyone working at or with the Facility in any capacity, have an affirmative duty to protect confidential and privileged resident, employee and business information; accessing and sharing such material only as warranted by operative laws, rules and regulations, some of which are summarized in Appendix A hereto. Regarding protected patient information – data, including demographic data, that relates to the individual's past, present or future physical or mental health or condition, the provision of health care to the individual or the past, present or future payment for the provision of health care to the individual, that identifies the individual or for which there is a reasonable basis to believe can be used to identify the individual – foremost among these statutes are HIPAA⁷ and HITECH.⁸ Proprietary information and intellectual property may include ideas, inventions, software, books, new ways of doing things, financial statements, plans, discussions, customer lists or anything else that a business would not want a competitor to know. Some practical examples of protective care include refraining from discussing private information in public areas, sharing sensitive information only with appropriate individuals who need to know the information to do their jobs, properly indicating the sensitivity of confidential written material, delivering such material to designated recipients directly rather than leaving it at an unoccupied desk, refraining from leaving the machine unattended while making copies of such material and shredding or otherwise destroying waste copies. To further assist in ensuring such security, Greenwood Connections may institute other policies to safeguard confidentiality. Given the complex technical regulations related to the release of proprietary, privileged and/or confidential material to others, staff members, service providers and business associates should refer all requests for information to the Committee and Greenwood Connections' General Counsel. Only such trained professionals should attempt to handle issues of privilege and the release of confidential patient and business information outside the organization. Should a breach of unsecured protected health information occur, Greenwood Connections will provide all appropriate notification in accordance with the HITECH guidelines.

IV. COMPLIANCE OFFICERS

Greenwood Connections has established a Compliance and Ethics Committee. The Committee, chaired by the Administrator, has been given the authority and resources necessary to carry out its duty to ensure regulatory and ethics compliance. A complete list of the members of the Compliance Committee,

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as well as each member's contact information, will be displayed in a conspicuous place in the Facility and posted on Greenwood Connections' website, with additional copies available in the business office. The committee will consist of members of the governing board as well as the management staff of Greenwood Connections.

The Administrator, with the assistance of the Committee, is tasked with assisting Greenwood Connections in its endeavor to develop a culture that values compliance from the top down and fosters compliance from the bottom up and helping to implement the Program by, among other things:

1. Identifying, evaluating and prioritizing the greatest areas of compliance risk, based on, among other things, OIG Work Plans, Compliance Alerts, survey and audit findings (past and present), payer denials, and/or discussions with and reports from staff members and managers;
2. Creating an annual compliance work plan, along with anticipated budgetary needs, and presenting such blueprint to the City Council and/or the Governing Board as appropriate;
3. Efficiently utilizing the resources given to [him/her] and requesting more resources when necessary;
4. Ensuring that the Manual is distributed to all staff members and collecting each member's executed acknowledgment form;
5. Developing, coordinating, implementing and overseeing the Program, including the training and education of Greenwood Connections personnel;
6. Accessing and reviewing any and all documents that are relevant for effective compliance activities;
7. Monitoring the Program to ensure that it is up-to-date with any and all modifications to legal and regulatory standards as well as the evolving realities and needs of the Facility and amending the Program appropriately;
8. Ensuring that all legally required background checks are conducted and that OIG's List of Excluded Individuals/Entities is reviewed periodically to confirm that Greenwood Connections does not employ or contract with anyone who has been excluded from participating in government or commercial health care programs and/or convicted of certain crimes in violation of law;
9. Investigating compliance and ethics issues that arise to determine whether (i) a violation has, in fact, occurred; (ii) disciplinary action is required; and (iii) all reasonable steps to respond appropriately to a violation and to prevent similar violations have been taken;
10. Aiding supervisors, Committee members and/or Greenwood Connections' General Counsel in developing and implementing resolutions to compliance issues that arise, including recommending and assessing punishments, overpayment returns, whether or not voluntary disclosure is appropriate and other corrective actions for violations; Following up, as appropriate, with personnel regarding reports they have filed, thereby generating confidence in the Program by exhibiting the seriousness with which compliance issues are handled;
11. Reviewing previous citations and survey tags for potential patterns of deficiency to ensure that recurring problems are addressed more urgently and with greater resolve;

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12. Acting with management's (Ownership, the CEO and/or the Governing Body) implied or express authority and commitment to the integrity of the Program, when necessary;
13. Maintaining the anonymous reporting procedure via the Employee Compliance Reporting Box located by the time clock and ensuring a log of reports is properly kept, and safeguarding the integrity and effectiveness of these mechanisms;
14. Coordinating efforts and sharing of information between the Committee, Greenwood Connections' lawyers and internal and/or external auditors and monitors, as necessary;
15. Analyzing audit findings, with the assistance of legal counsel as appropriate, and advising management on remedial options so they can properly decide what course to pursue; and
16. Periodically assessing the effectiveness of the Program as a means of improvement, by evaluating the implementation of policies and procedures, employee awareness of the Program and other appropriate methods.

The Administrator and/or the Committee will report to the City Council and/or the Governing Board directly no less than on an annual basis and more frequently, as necessary. These in-person meetings may be accompanied by a written report and shall address the performance of the Program in the prior period, any ongoing compliance issues of concern and the Program's objectives and work plan for the coming period. Those to whom the Administrator reports shall work to ensure that the Program is effective and current and is endowed with the resources and authority needed to achieve its objectives. These executives are also tasked with ensuring that the Administrator is duly performing [his/her] responsibilities. As such, they shall review internal controls and audits, assess risk management and retain external auditors if necessary.

V. DUE CARE IN DELEGATION OF AUTHORITY

Greenwood Connections has used due care in its delegation of discretionary authority, granting such influence only to qualified and accomplished staff members. Aside from the standard background checks, those in positions of authority may be subject to more careful personal and professional scrutiny and are only granted discretionary authority upon reliable recommendation.

VI. EDUCATION AND TRAINING

While the Manual is an educational tool, Greenwood Connections recognizes the need to further train and educate staff members. At a minimum, each incoming staff member is required to complete an initial online training upon hire or prior to initiation of services. In addition, Greenwood Connections has instituted annual refresher training sessions for all staff members in which Greenwood Connections compliance representatives will review existing policies and introduce and explain any additions and/or modifications to the Program. The training sessions may be conducted by duly qualified Greenwood Connections personnel, online training or both and may include live lectures, videos, computer programs and/or online interactive sessions. To further enhance the efficiency of these sessions, Greenwood Connections may have multiple different classes tailored for the different employment fields and positions concentrating on the issues that are most relevant to the particular group of

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personnel. There may also be programs to address specific issues and concerns that may arise over the course of the year.

VII. STEPS TAKEN TO ACHIEVE COMPLIANCE

The appropriate practical action Greenwood Connections has taken to achieve compliance with the Program's standards is reflected in several techniques set forth in this Manual. Foremost among these measures is Greenwood Connection's comprehensive reporting system, whereby staff members, including service providers and business associates, are provided multiple avenues of communicating concerns and incidents involving compliance and ethics issues. Personnel are encouraged to communicate freely with supervisors, the Administrator or a Committee member either in person or by email, anonymously via the Employee Reporting Box or by the annual employment survey. If any staff member feels that he or she received an inadequate response for an in-person report, the employee should contact another person to make sure that the issue is addressed. Greenwood Connections' strict No Retaliation Policy ensures that personnel are protected from any retribution for coming forward with reports of known or suspected illicit activity. The workings and importance of the reporting system is conveyed to all personnel upon their joining Greenwood Connections and periodically thereafter through annual training and education courses. Furthermore, Greenwood Connections endeavors to follow up with staff members who file reports, as appropriate and practicable, as a means of conveying our sincere commitment to addressing compliance matters and concerns. Another attempt to achieve compliance lies in Greenwood Connections' multiple investigative and oversight tools to monitor and audit regulatory and ethics issues. Through internal controls and internal and external audits, among other things, we strive to bring Greenwood Connections' entire goings on in line with current regulatory and ethical standards and ensure that the Program itself is as effective and efficient as possible. Specifically, audits may focus on hot-button issues (identified as such based on OIG Work Plans, Compliance Alerts and previous surveys and audits and payer denials or any other issue deemed appropriate or advisable by Greenwood Connections) such as billing, coding, medical necessity, referrals and other claims related issues; hospital readmissions and hospitalizations, staffing patterns, communicable disease care, rates of adverse events, plans of care and related quality matters; and compliance concerns, including professional review of training and education classes and material and the use of interviews, surveys and other established methods to get feedback from staff members on the effectiveness of policies, ways in which procedures can be improved and employees' perspectives on their relationship with management. Greenwood Connections may also use exit interviews with outgoing personnel to glean information as to how operations and compliance can be improved. Follow-up monitoring, as well, may be conducted to help ensure an effective and enduring resolution of noncompliance findings.

VIII. CONSISTENT DISCIPLINARY ENFORCEMENT

Greenwood Connections recognizes that the consistent enforcement of this Program is critical for its authenticity. Therefore, Greenwood Connections will enforce the principles of this Program and

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appropriately discipline anyone who knowingly and willingly – or, in some instances, even recklessly or negligently – violates its principles, either actively or passively.

IX. APPROPRIATELY RESPONDING TO OFFENSES

If an alleged violation of the Program or an operative law, rule or regulation is brought to the attention of a supervisor, the Administrator or a Committee member – or if the offense is otherwise detected – a formal investigation may commence. The Administrator may manage a suitable inquiry into the matter – including, as appropriate, interviews of people who may have knowledge of the alleged conduct; reviews of relevant documentation; and preparation of a report of the investigation – and may make a determination whether and to what extent a violation has taken place. Should the Administrator, with the assistance of the Committee and in consultation with counsel if necessary, conclude that a violation was committed, any and all available reasonable remedies will be pursued in a timely manner. This may include the repayment of ill-gotten funds via overpayments, duplicate billings or improper compensations. The Administrator, along with the Committee and legal counsel, may also determine that voluntary disclosure to government authorities and/or payers may be appropriate. Required disclosures and submissions, such as correction plans for deficiencies identified during surveys, will also be duly performed. Furthermore, the Committee may review identified violations in search of possible lessons to be learned in order to prevent such infringements from reoccurring and help develop a corrective action plan accordingly. Any modifications to the Program that may help prevent such reoccurrence or assist in the detection of such a violation will be implemented as soon as practicable. Additional training may also be provided, as appropriate. Another means of averting future violations is to deter the perpetrator and others from lax compliance with the Program. To that end, should a determination be made upon appropriate investigation that a Greenwood Connections staff member, including anyone working at or with the Facility in any capacity, knowingly and willingly – or, in certain circumstances, even recklessly or negligently – violated the Program or an operative law, rule or regulation, recommendation for disciplinary action may be made to HR, who is responsible for determining the proper punishment. HR shall then instruct the appropriate supervisor or manager what disciplinary action should be taken. All disciplinary action shall be enforced by supervisors and/or managers. Available disciplinary actions – to be meted out according to the seriousness and prevalence of the offense – include verbal warnings, written warnings, suspension, and modification of compensation, privilege revocation, financial penalty and termination of employment or relationship. Where appropriate, referrals for further disciplinary action by law enforcement authority may be made. Greenwood Connections disciplinary action shall be taken under the guidance and supervision of legal counsel, as needed. The disciplinary process will be enforced in a timely, decisive and public manner and each step of the process will be well documented. It will be made clear to the staff and everyone who comes in contact with Greenwood Connections that we take regulatory and ethics compliance very seriously.

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X. PERIODIC REASSESSMENT OF THE PROGRAM

An effective and efficient compliance and ethics program must remain current – properly reflecting contemporary laws and policies; existing conditions in the greater industry as well as the specific facility; and the latest focus trends of regulatory enforcement agencies. Periodic reassessment of the Program is necessary. Thus, Greenwood Connections shall undertake to internally monitor and audit the Program as appropriate. The Committee will have applicable federal, state and local rules, laws, alerts and regulations monitored for changes that are relevant to Greenwood Connections. The Committee may also manage a reassessment, enlisting the assistance of various staff members to study the latest compliance developments and identify areas of the Program that require modification. These efforts are in addition to – rather than in place of – reviews of the fundamental effectiveness of the Program systems and structures and assessments of the overall success of the Program in general, as well as each of its basic elements. Greenwood Connections also recognizes the need for ongoing external auditing and monitoring to ensure objectivity in implementing, enforcing and updating a proper compliance program. As such, the Committee may procure the services of independent third-party consultants, as needed. These efforts will help the Program remain relevant and useful in effectively guiding Greenwood Connections to achieve full regulatory and ethics compliance.

XI. CONCLUSION

Our priority is and should always remain providing the highest level of care practicable to our residents. Greenwood Connections appreciates the pivotal role an effective and efficient compliance and ethics program plays in achieving our mission. We count on your full support of our compliance efforts and look forward to working with you in making this Program a success.