

RE: Deficit Reduction Act of 2005 (“DRA”) Education Requirements Reporting Reasonable Suspicion of a Crime in Long-Term Care Facility Government Exclusions Checks

ProMedica Senior Care Contractor or Agent:

Federal and state laws require providers to educate their contractors and agents regarding certain laws and policies. Information about the following three items can be found on the company’s website: <https://promedicaseniorcare.org> under the Vendor Policies tab:

1. DRA Requirements:

The DRA requires providers to supply information regarding the Federal False Claims Act, administrative remedies for false claims and statements, applicable state false claims provisions and whistleblower protections under these laws. The Standards of Business Conduct (“Standards”) is the company’s policy for the prevention of health care fraud, waste and abuse.

2. Reporting Reasonable Suspicion of a Crime:

ProMedica Senior Care is committed to the safety of its patients and ensuring that reasonable suspicion of crimes is properly reported in accordance with the law. Our policy requires that crimes against patients are reported to local law enforcement and the state survey agency. Key information about these requirements include the Centers for Medicare & Medicaid Services (“CMS”) memo dated 6.17.11, which was revised 1.20.12, and a document outlining the company’s reporting expectations.

3. Government Exclusions Checks:

It is the policy of ProMedica Senior Care to perform checks on employees and contractors to ensure that any payments received from state or federal funds are not for items or services that are directly or indirectly furnished, ordered, directed, managed or prescribed in whole or in part by an excluded, unlicensed or uncertified individual or entity.

The above information is provided to all contractors and agents who have contact with the company’s business units and it is the expectation that they will abide by these Standards, policies, and all federal and state rules, regulations and laws in the provision of services to the company.