

SEASHORE GARDENS LIVING CENTER
VENDOR / CONTRACTOR COMPLIANCE ACKNOWLEDGMENT FORM

Policy #10250

Vendor acknowledges Seashore Gardens Living Center's compliance program and the following policies and requirements:

1. Conflict of Interest. In order for Seashore Gardens Living Center's employees to perform their duties with honesty and fairness and in the best interest of Seashore Gardens Living Center, employees must avoid conflicts of interest in their employment. Conflicts of interest may arise from having a position or interest in, or furnishing managerial or consultative services to any concern or business from which Seashore Gardens Living Center obtains goods or services, or with which it competes or does business, and from soliciting or accepting gifts, excessive entertainment or gratuities from any person or entity that does, or is seeking to do, business with Seashore Gardens Living Center. Vendors and/or contractors shall not retain any of Seashore Gardens Living Center's employees to assist them in business or pay any of Seashore Gardens Living Center's employees for any services furnished to their business. Vendors and/or contractors shall not offer or give any of Seashore Gardens Living Center's employees any gifts, favors, gratuities, or excessive entertainment. This, however, does not prohibit offering or giving items of nominal or minor value (a) that are clearly tokens of respect or friendship and not related to any particular transaction or activity of Seashore Gardens Living Center, or (b) which do not go beyond the common courtesies usually associated with accepted business practices, such as baseball caps and the exchange of lunch or dinner meetings which occur as a normal part of a healthy business relationship.
2. Charities. Seashore Gardens Living Center is involved with and supports several charities. Vendors and/or contractors are not required or expected to contribute to any such charity as part of or as a condition of doing business with Seashore Gardens Living Center. It is not proper for any of Seashore Gardens Living Center's employees to suggest otherwise. Of course, vendors and/or contractors may support any charity desired regardless of its relationship with Seashore Gardens Living Center, but is an entirely voluntary matter.
3. Grants. Seashore Gardens Living Center will accept grants from vendors and other non-governmental entities, but only for use in connection with the grant money's stated business purpose. Seashore Gardens Living Center will not accept grant money as an inducement to generate business for the grantor. All grants must be approved in advance by Seashore Gardens Living Center's compliance officer or his/her designee.
4. Fraud and Abuse. Seashore Gardens Living Center employees are required to refrain from conduct that may violate fraud and abuse laws. Among other things, these laws prohibit direct, indirect or disguised payments in exchange for referral of patients. Vendors and/or contractors will not receive any inducements from Seashore Gardens Living Center for referring patients to that facility. Vendors and/or contractors are not required or expected to refer patients to Seashore Gardens Living Center as part of or as a condition of doing business with Seashore Gardens Living Center.

5. Adherence to the Deficit Reduction Act of 2005, 42 U.S.C. Section 1396a(a)(68). For a copy of Seashore Gardens Living Center's Policy and Procedure please contact Seashore Gardens Living Center's Compliance Officer and ask for Policy #10000 – *Our Compliance Plan Attachment B – Deficit Reduction Act of 2005* – or review Attachment B on pages 24 through 31 of our Compliance Plan located on the previous screen.
6. Financial Inducements. No Seashore Gardens Living Center employee may offer any financial inducement, gift, payoff, kickback, or bribe intended to induce, influence or reward favorable decisions of or terms from any contractor or vendor in a commercial or business transaction or any person in a position to benefit Seashore Gardens Living Center or the employee in any way. Employees must act honestly and with integrity in their business dealings with all contractors and vendors. We know this is what you expect and that you will act likewise in your dealings and transactions with Seashore Gardens Living Center.
7. Rebates. Appropriate rebates, discounts and allowances are customary and acceptable business practices provided that they do not constitute illegal or unethical payments. Any such rebate, discount or allowance given or made to Seashore Gardens Living Center must have a reasonable business or commercial basis and should be competitively justified. Payments shall be made to Seashore Gardens Living Center and not to any employee of Seashore Gardens Living Center.
8. Discharge Planning. Seashore Gardens Living Center is legally required to perform discharge-planning services for its residents. Delegation of this service is prohibited to anyone other than an employee of Seashore Gardens Living Center, with limited exceptions that must be approved of in advance from the Compliance Officer or his/her designee.
9. Compliance Officer. Seashore Gardens Living Center has a compliance officer who oversees and monitors the compliance program. If you have any questions about the program as it may affect you, please feel free to call our Compliance Officer at (609) 404-4848. If any vendor and/or contractor believes that employees of Seashore Gardens Living Center have been less than completely honest in their dealings or in suggestions made, please advise the compliance officer or Legal Counsel. If you prefer, you may call the "Compliance Hotline" at (800) 557-1066 and leave an anonymous message.
10. Screening. Seashore Gardens Living Center will conduct background investigations on vendors and contractors to determine if any such vendor or contractor has a criminal conviction related to health care or has been disbarred or excluded by a federal agency. Seashore Gardens Living Center will not contract with any person or entity that has been so convicted or excluded or debarred and will attempt to terminate its contract arrangements with any such person or entity.
11. Offshore Operations. Seashore Gardens Living Center does not perform Offshore Services.

VENDOR CERTIFICATION OF COMPLIANCE WITH EMPLOYEE BACKGROUND SCREENINGS & SEASHORE GARDENS LIVING CENTER'S COMPLIANCE PROGRAM INCLUDING SEASHORE GARDENS LIVING CENTER'S MANDATORY COMPLIANCE TRAINING

Vendor hereby certifies that it has performed criminal background checks on all employees or agents (“employees”) providing direct services to Seashore Gardens Living Center and has determined that no such employee or agent has a criminal conviction related to or affecting healthcare or the care of an elderly or disabled person.

Vendor certifies that it has verified that all employees or agents (“employees”) providing direct services to Seashore Gardens Living Center are not listed on the US Office of Inspector General’s Medicare or State maintained Medicaid Exclusion database (“exclusion checks”). Vendor certifies that it does exclusion checks on a monthly basis for all employees.

Vendor certifies that all of Vendor’s employees or agents providing direct services to Seashore Gardens Living Center (“employees”) hold licenses or certifications necessary to provide such services and have been verified by Vendor at least once during the past 12 month period as holding a valid license or certification in good standing as required by state or federal law. Documentation of this verification is maintained on file by Vendor.

Vendor certifies that it does not perform Offshore Services.

Vendor acknowledges receipt of Seashore Gardens Living Center’s “Compliance Plan”, which includes Code of Conduct, Deficit Reduction Act, and Policy Against Harassment. Vendor agrees to disseminate Seashore Gardens Living Center’s “Compliance Plan” to owners, managers and employees. Vendor agrees to abide by all Compliance Program requirements and understand that adherence to this document and other policies and procedures in Seashore Gardens Living Center’s Compliance Program Manual is a condition of continued business dealings with Seashore Gardens Living Center.

Vendor also agrees to participate in Seashore Gardens Living Center’s mandatory compliance training which can be accessed as follows:

Go to www.mednetcompliance.com
Click on: E-LEARNING COURSES
Click on: FRAUD WASTE AND ABUSE
Click on: ELEMENTS OF A COMPLIANCE PROGRAM AND CODE OF CONDUCT
Password: elements1

Print Name

Title

Sign Name

Date