



Dear Vendor/Contractor/Physician/Service Provider:

Lutheran Social Ministries of New Jersey (LSMNJ) 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 our contractors 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 below listed laws and regulations.

Compliance Program: The Organization has a compliance program. A core document of any compliance program is the Code of Conduct which covers the compliance issues, laws and regulations and guidelines that are relevant to providers of senior services. This Code of Conduct is relevant to all individuals, including employees, contractors, volunteers, directors and officers.

Below you will find a summary of our Code of Conduct. Please assure that you review your obligation to abide by our compliance program as a requirement of doing business with the Organization.

Excluded Provider Policy: The Organization cannot do business with any individuals or entities sanctioned by the Federal and State Government. It is your duty to inform us immediately if your organization or anyone under your employment is currently 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 to report to local law enforcement, and to the Secretary of Health and Human Services, their reasonable suspicion of crimes committed against nursing home residents. This reporting must happen in a timely manner.

If the events that cause the suspicion—

- 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.

Please be sure to inform all of your employees who, in the course of business, are present on any of our community's campuses, are aware of these obligations.

Deficit Reduction Act (DRA): We are required to comply with the Deficit Reduction) DRA. As such we are required to notify our contractors and others of the policies to prevent false claims, retaliation and the rights of whistleblowers. The rules for the DRA include the following;

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- Federal False Claims Act (31 U.S.C. §§ 3729-3733)
- Federal Civil and Criminal Penalties and Administrative Remedies
 - *False Claims Act Civil Penalties (31 U.S.C. § 3729)*
 - *Program Fraud and Civil Remedies Act of 1986 ("PFCRA") (31 U.S.C. §§ 3801-3812)*
 - *Civil Monetary Penalties Law ("CMPL") (42 U.S.C. § 1320a-7a)*
 - *Criminal Penalties (42 U.S.C. § 1320a-7b)*
 - *Exclusion from Participation in Federal Health Care Programs (42 U.S.C. § 1320a-7)*
- State False Claims Laws
- Federal "Qui Tam" or "Whistleblower" Protections (31 U.S.C. § 3730)

You are encouraged to communicate any compliance concerns to **Sherry Outten, Compliance Official at 609-699-4152 or soutten@lsmnj.org**.

If you or one of your staff members prefer to report any compliance concern anonymously, please use the Compliance Hot Line 1-800-211-2713.

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

Lutheran Social Ministries of New Jersey