

Oaknoll Retirement Residence

Standards of Conduct

A message from our Leadership

The Board of Directors, CEO, and Administrator of Oaknoll consider the Standards of Conduct to be pillars of the organization. The standards exist to support Oaknoll's mission and values, as well as ethical and legal expectations for providing the highest quality of services. Oaknoll leadership is committed to compliance with all federal and state laws and regulations that apply to our business. Oaknoll has policies that promote lawful and ethical conduct by anyone who carries out duties or responsibilities on behalf of Oaknoll. Leadership expects everyone who works or associates with the organization to be committed to these standards and all related policies and procedures, including employees, vendors, business associates, students, and volunteers. The guidance protects you and the residents we serve.

Oaknoll's Mission is to provide exceptional retirement living and health services through LifeCare.

Oaknoll's Values are:

- Caring – demonstrating compassion in serving others
- Respect – demonstrating integrity and dignity in all interactions
- Enthusiasm – showing a passion and energy for your work
- Awareness – being mindful of the environment around you
- Teamwork – recognizing the power of working together
- Encouragement – cultivating a culture of skill development and personal growth

The values have the acronym CREATE – a powerful reminder that we are here to help our residents CREATE Home.

OVERVIEW

Oaknoll's Compliance Program is intended to further the Oaknoll Mission and align with our Values by:

- Helping Leadership and staff employees understand and comply with applicable laws, rules, and regulations;
- Preventing and detecting violations of law, regulation and organizational policy; and
- Promoting ethical conduct as articulated in the Standards of Conduct.

Oaknoll's Standards of Conduct describes our values, standards, and expectations that apply to every part of our operations. The Standards of Conduct define the appropriate

relationships Oaknoll strives to have with residents, families, employees, contractors, vendors, volunteers, students, and the community in which we work. All board members, officers, employees and volunteers must follow these standards for Oaknoll to grow and continue to be successful in the future.

Oaknoll recognizes that as a health care organization we must comply with all laws and regulations pertaining to the health care services we provide. We must make every effort to identify any risk for non-compliance. The Standards of Conduct supports these efforts by promoting ethical and legal behavior as well as transparency throughout the organization.

- The Standards of Conduct address many areas of potential unethical and illegal behavior, but it is not possible to list all situations that could raise a compliance concern. Oaknoll policies and procedures provide detailed guidance on how to handle circumstances that may not be immediately clear. There may be some times where neither the standards nor the policies provide the guidance needed to act ethically or legally. In these cases, you should contact you supervisor, manager or the Compliance Officer for guidance.
- The Standards of Conduct provide support to all board members, employees, volunteers and contractors, so they understand clearly Oaknoll's guidance for:
 - Commitment to ethical and legal expectations
 - Acting with integrity
 - Asking questions and reporting concerns
 - Available resources

COMMITMENT TO ETHICAL AND LEGAL EXPECTATIONS

Compliance Program

The Oaknoll Compliance Program is a comprehensive effort to promote ethical, compliant and legal behaviors while detecting and preventing fraud, waste, abuse and policy violations. It is designed to integrate these standards into all aspects of Oaknoll operations. The Compliance Officer coordinates and implements the program.

To promote compliance, Oaknoll has established a Compliance Committee to oversee systems and processes at every level and department. This includes the Board of Directors, Administration, and individual departments. The program is administered by the Corporate Compliance Officer. This person reports directly to the Audit Committee Compliance Officer of the Board of Directors and functions independently of the operating divisions. The goal of the Compliance Committee is to promote ethical behavior and compliance with legal requirements and company policies, resulting in quality care, accurate financial practices, and excellence in service. The following seven elements are the basis for our Compliance Program:

- Written Standards of Conduct and Policies
- Oversight by a Compliance Officer and Committee
- Training and Education
- Monitoring and Auditing
- Reporting and Investigating
- Enforcement
- Response and Prevention

Comprehensive Guidance

Board members, officers, employees, volunteers, contractors, and other entities or individuals with who have entered into a contract or other arrangement to conduct business on behalf of Oaknoll must review and comply with the Oaknoll Standards of Conduct to ensure that all actions are consistent with the Oaknoll mission.

Any contractor, subcontractor or vendor conducting business on behalf of Oaknoll must follow laws and regulations for all billing and coding services and resident care services. Each of us can help promote Oaknoll's success by following the Standards of Conduct.

Problem and Solution

What do I do if I think the practices in my department are in violation of the Standards of Conduct?

- You should raise this concern with your manager or supervisor. If you are uncomfortable doing so, or the situation involves the manager or supervisor, you may proceed to the next level of management or use one of the other reporting methods described in the Standards of Conduct such as: calling the Compliance Hotline at 319-466-3069, sending an email to the Compliance line at compliance@oaknoll.com, sending a fax to the Compliance fax line at 319-466-3023. An investigation may reveal there is a need for correction, education or clarification. It may also reveal that other individuals have had similar concerns and there is a need to address the matter organization wide. In any case, Oaknoll is appreciative of an individual's willingness to contribute to our success by allowing us to address questions and concerns in order to implement corrective actions when necessary.

ACTING WITH INTEGRITY

Oaknoll strives to:

- Deliver the highest quality of services
- Maintain a respectful work environment
- Ensure financial transparency
- Maintain confidentiality of all protected health information
- Honor strict ethical standards

Board members, employees, volunteers and contractors are expected to follow practices that promote these standards. When we act with integrity within the workplace we ensure that our actions are consistent with Oaknoll's commitment to excellence in all our services.

Criminal conduct is not tolerated in the course of carrying out assigned duties for Oaknoll. Suspected criminal conduct should be reported immediately through the appropriate chain of command. Oaknoll will pursue prosecution of criminal conduct to the fullest extent of the law.

Quality of Care

Dedication to quality is demonstrated in our goal to:

- Understand and uphold our resident's rights, dignity and expectations;
- Provide care and services in a timely and reasonable manner;
- Be responsive to resident and family concerns; and
- Enrich the lives of residents with Person Centered Care

Each resident is entitled to dignity, consideration and respect. Resident abuse or neglect is not tolerated.

Oaknoll respects the rights of residents and family members to participate in health care decisions and must inform them of their rights, as required by law.

When residents are in our community, we promote ethical, innovative, professional, and compassionate care within an environment which nurtures their physical, social, emotional and spiritual needs.

Discrimination Free and Harassment Free Workplace

Oaknoll prohibits discrimination and all forms of harassment due to a person's race, color, religion, gender, sexual orientation, military duty, age, national origin, disability or veteran status or any other basis protected by federal, state, and local laws. All board members, employees, volunteers and contractors are responsible for preventing discrimination and harassment and should report any suspected conduct.

To ensure Oaknoll's commitment of integrity we will maintain the highest level of performance, behave professionally at all times and promote exemplary standards of behavior. This includes using respectful communication at all times.

Problem and Solution

What should I do if I experience or witness discrimination or harassment in the workplace?

- You are encouraged and expected to report such occurrences to your Manager, Supervisor, Administrator, CEO, or Chief Human Resources Officer, or by calling the Compliance Hotline at 319-466-3069. If you feel the matter has not been taken seriously, you are encouraged to report it to the next level of management. For more information, please refer to the Employee Handbook, page 13.*

Investigation and Survey Cooperation

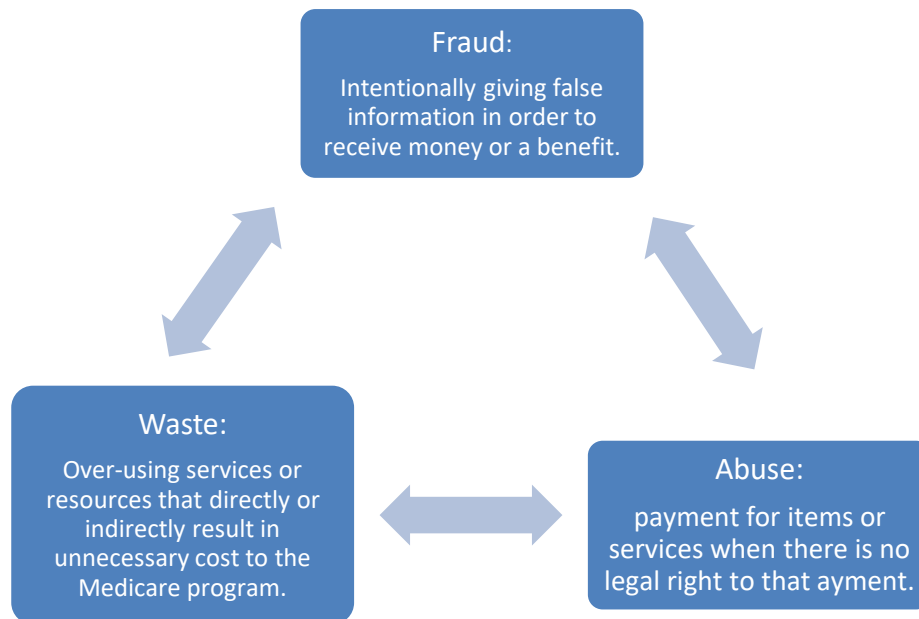
Oaknoll will cooperate with the Department of Inspections and Appeals Survey process. Oaknoll will not tolerate anyone impeding a department investigation or survey in any way, including but not limited to, providing false or incomplete information to a surveyor.

Oaknoll recognizes the authority of various state and federal agencies to carry out investigations or to conduct oversight reviews of our operations and/or personnel. We will treat government agents with courtesy and respect and cooperate fully within our obligations under the law. It is unacceptable for an Oaknoll employee, volunteer or contractor to impede an investigation or oversight review.

For non-routine government inquiries/investigations, Oaknoll will ensure that our rights are protected in the process. If an investigator enters the building, contact the Administrator or Director of Nursing immediately.

Fraud, Waste, and Abuse

Oaknoll is committed to detecting and preventing fraud, waste, and abuse. Oaknoll has developed and implemented policies and procedures to ensure compliance with the laws that govern our operations as a health care provider.



In addition to written policies and procedures, Oaknoll provides regular education to board members and employees on preventing fraud, waste, and abuse through general and focused compliance training on applicable laws and regulations.

These include, but are not limited to, the Federal False Claims Act (31 U.S.C. §§ 3729-3733) and similar state laws which assist the federal and state governments in preventing fraud, waste, and abuse and recovering financial losses. These laws prohibit the intentional use of false or fraudulent claims, records or statements for the purpose of obtaining payment from the government, including Medicare and Medicaid programs.

Some examples may include:

- Submitting, or causing to be submitted, a false claim for services
- Manipulation of billing codes to obtain a higher total reimbursement
- Providing false information on cost reports or other documentation filed or used with Medicare and Medicaid
- Knowingly and willfully making materially false statements concerning federal health care programs

A violation of these laws could place the organization and individuals in serious jeopardy of civil, criminal and/or administrative penalties including monetary penalties, imprisonment and exclusion from participation in Medicare or Medicaid and loss of licensure status.

Federal law and some state laws allow private citizens to file a lawsuit on behalf of the government and share a percentage of any settlement. These laws and Oaknoll policy prohibit retaliating or discriminating against anyone because of their initiation of, or participation in, a lawful false claims investigation, report, claim or proceeding. These laws also provide for certain monetary awards and equitable relief to a prevailing complainant, including compensation for lost wages, and reinstatement to a former position. Suspected false claim violations must be reported to Oaknoll management, the Compliance Hotline at 319-466-3069, or to the appropriate federal/state agency.

Safeguarding of Resources

Resident Protections

Health Insurance Portability and Accountability Act (HIPAA) (Public Law 104-191) - Oaknoll board, employees, volunteers and contractors are all responsible for maintaining confidentiality of all resident protected health information (PHI). PHI is defined as individually identifiable health information that is created, received, maintained or transmitted in any form or media, including electronic health information.

To ensure the security of PHI, Oaknoll takes reasonable measures including, but not limited to, the following:

- Encryption of devices
- Use of password protection
- Limitations on accessibility
- Guidelines for maintaining paper documents and storing electronic devices, in any location or during travel
- Restrictions on installing or loading unauthorized software on Oaknoll devices

Any unauthorized exposure of PHI, which reasonably compromises the security or privacy of the PHI is a potential breach that must be appropriately addressed. If you become aware of a breach or potential breach of any PHI it is necessary that the situation be immediately reported to the Oaknoll management or the Compliance Hotline at 319-466-3069, so that all federal and state notification requirements may be carried out by the Compliance Officer. If the disclosure of the PHI results in a breach notification, Oaknoll complies with all state and federal regulations. Failure to do so may subject Oaknoll to fines and penalties in accordance with HIPAA. Employees that fail to follow these guidelines will be subject to appropriate corrective action up to and including termination, please see Employee Handbook, page 12.

Property Protections

Any mishandling of resident or Oaknoll property must be promptly reported to supervisors. Employees are entrusted with direct handling of resident funds, will be held accountable for the integrity and accuracy of those monies and records.

Problems and Solution

What would I do if I accidentally sent a fax containing PHI to the wrong fax number?

- If you are aware of it, you should immediately contact the recipient and ask them to destroy it. If you are notified by the recipient that they received a misdirected fax, you should ask them to destroy it. In either case, you would report this to your Compliance Officer by calling the Compliance Hotline at 319-466-3069. Whoever reports the occurrence should provide details about what PHI was contained in the fax and confirm the recipient agreed to confidentially destroy it, so that an appropriate follow up can determine any further reporting requirements. To prevent future occurrences regularly used fax numbers should be programmed into the fax machine and reviewed periodically for accuracy, or as an alternative, the information may be scanned and sent via secure email.*

Company Protections

Oaknoll policies which comply with applicable laws and regulations, must be followed for all company documents, establish procedures for the completion, retention, preservation and destruction of such materials in both paper and electronic form. Professional, accurate, timely and complete records must be maintained in all of Oaknoll's clinical, billing, reimbursement and financial activity. No documentation should be falsified.

- Clinical and Medical Records:** Oaknoll requires that all documentation created in support of the evaluation, planning and implementation of health care services be accurate, timely and prepared in a professional manner. Oaknoll has adopted health information management standards, for policies, with respect to clinical and medical record documentation.
- Billing and Reimbursement Records:** All federal and state regulations governing billing, coding and documentation will be followed for all services rendered by Oaknoll. Contractors who provide services on behalf of Oaknoll shall be held to the same standard. Billing and coding for services must be accurate and truthful. No personnel should ever misrepresent charges or services to or on behalf of a resident or third-party payor. Only those medical services that are consistent with accepted standards of medical care may be billed. Billing and coding must always be based on accurate documentation of

the medical necessity for the services provided and for the bill submitted. This supportive medical documentation must comply with all applicable regulations.

- **Financial Records:** Compliance with accepted accounting rules and controls is expected at all times. All financial records and accounts must be accurately stated. Personnel assigned to tasks connected with financial accounts must do their part in ensuring the accuracy of financial books, records and accounts. Secret accounts, unrecorded bank accounts, off the books bookkeeping, slush funds or any other devices that could be utilized to mislead, or inaccurately reflect actual operating and financial conditions, are strictly forbidden. Oaknoll is a 501(c) 3 organization under Internal Revenue Service law. As such, certain charitable donations made to Oaknoll can be accepted. Proper accounting of such donations made to Oaknoll can be accepted. Proper accounting of such donations will occur consistent with the law and Oaknoll's financial policies and procedures.

Proprietary Information

Confidential information about Oaknoll business is a valuable asset and is intended for use only within Oaknoll. All information concerning finances, operations, products, policies, customers, development plans, computer programs, and related information should be treated as proprietary and confidential. This information should not be released by anyone outside of Oaknoll such as competitors, suppliers, contractors, vendors, or other business associates.

Property, Equipment and Supplies

Oaknoll resources shall be used for authorized business purposes only. All assets, property, facilities, equipment and supplies are protected against loss, theft, damage and misuse.

Employee Protections

Oaknoll employee and personnel files are confidential. Only individuals authorized according to Oaknoll policy and state and federal law will have access to employee records.

Contractors and Vendors

Any independent contractor, subcontractor or vendor conducting business on behalf of Oaknoll must adhere to all applicable laws and regulations. When applicable, contractors providing care on Oaknoll's behalf must show proof of licensure, certification or other evidence of provider competency. This does not apply to contractors providing care on behalf of residents or resident family members (private hire). Contractors providing care on Oaknoll's behalf must not possess a criminal conviction record that prohibits them from working within the health center under state or federal laws and /or Oaknoll criminal background screening.

Gifts, Gratuities, and Business Courtesies

Oaknoll does not encourage or request personal gifts, monetary tips, or other benefits from persons with whom we have, or may have, a direct care relationship. Our residents and family members make a substantial investment in the care and services we provide. It is critical that we keep our relationships fair and ethical. A resident or family member is not expected to provide gifts to staff in order to receive good care. Conversely, Oaknoll will not accept a gift from a resident or family member intended to influence the care and service provided to the resident.

Individual gift offers must be politely declined or brought to the attention of your supervisor.

Kickbacks, Referrals and Bribes

Oaknoll will conduct business with suppliers and vendors on the basis of fair market price, quality, service and the needs at Oaknoll. Our board members and employees involved in the purchasing of goods or services on Oaknoll's behalf are prohibited from soliciting gifts, gratuities or personal benefits from the supplier or contractor/vendor. Likewise, they must decline any offer of a direct or indirect personal benefit from a supplier or contractor/vendor.

During the holidays, if suppliers, contractors, and/or vendors provide nominally valued gifts, such as perishable food items and candles for the benefit of a group, these may be accepted provided they are unsolicited.

The giving of cash or cash equivalent gifts to referral services in exchange for the referral of business is prohibited. Business courtesies for or from contractors, vendors or referral sources have the potential of putting Oaknoll at risk of violating federal anti-kickback laws. Such business courtesies must receive supervisory approval before being offered or accepted. Approval will not be given to any business courtesy construed as a referral fee, bribe, kickback, or a payoff of any sort. Approved business

courtesies must not place liability on Oaknoll or lead to reputational harm or embarrassment.

If Oaknoll is going to give gifts to a hospital or other agency, it should not limit the gifts to only those that generate the most referrals or business for Oaknoll. Rather, similar gifts will be given to all of the area hospitals or like agencies, regardless of the amount of referrals or business they generate.

Questions should be directed to the Compliance Officer to assure the arrangement will not jeopardize compliance with law and regulations governing kickbacks or inducements.

Refer to the Employee Handbook, page 18 and Corporate Compliance policies. Applicable laws and regulations include, but are not limited to:

- Anti-Kickback Statute (42 U.S.C. § 1320a-7b(b))
- The Beneficiary Inducement Statute (42 U.S.C. § 1320a-7a(a)(5))
- Physician Self-Referral (“Stark”) Statute (42 U.S.C. § 1395nn)

Problem and Solution

What should I do if I am unsure of whether an agreement with a contractor is appropriate or legal?

- *You should not enter into the agreement or contract until verification of the legality and adherence to Oaknoll standards is obtained. A Compliance Office review of an agreement or contract may be requested at any time.*

Marketing and Competitive Practices

Oaknoll marketing efforts are carried out with a high degree of integrity to avoid improper favorable treatment or advantage. Oaknoll engages in competitive practices that are legal and consistent with the mission. It is illegal for Oaknoll and competitors to get together and fix prices, salaries, or markets in which we compete. Oaknoll will independently decide what is charged and what we pay in the markets we operate in.

When engaging in advertisement, statements must be truthful and supported with evidence. Any comparative advertising must be fair and accurate. Marketing efforts are not to be misleading. No marketing materials or statements may intentionally cause confusion about the services Oaknoll offers or the services offered by our competitors.

Oaknoll will not enter into agreements or arrangements that unlawfully restrict our ability to compete with other businesses or the ability of other businesses to compete freely with us.

Nominally valued non-cash marketing items which are clearly marked with the Oaknoll logo may be provided to referral sources or potential customers as a function of our marketing program. For nominally valued items other than marketing items, a supervisor must provide prior approval.

Conflicts of Interest

Oaknoll board members and employees will not engage in any activities that conflict with the interests of Oaknoll. It is the responsibility of our employees and board members to put the interests of Oaknoll and our residents ahead of any other business interests. Any potential conflicts should be disclosed to Oaknoll upon hire or as they occur. This includes any additional employment accepted while working at Oaknoll. You may disclose these potential conflicts to your supervisor, to administration, to the Compliance Officer, or to the Board of Directors. Potential conflicts of interest that are not disclosed or approved could subject a person to termination by Oaknoll.

Gifts to Public Officials

No board member or employee should give gifts to a public official or public employee, to encourage official action that may influence referrals. Both federal and state election laws forbid corporations from expenditures or contributions of money, or anything of value, to a candidate or committee in connection with an election to office. It is illegal to use company assets by Oaknoll for this purpose.

Problem and Solution

A vendor offered me ticket to a Hawkeye football game. I don't plan to use them but wanted to give them to my brother, is that ok?

- No. Although Oaknoll encourages establishing positive relationships with our business partners, accepting a gift, even if we don't plan to use it, is strictly prohibited. The acceptance of a gift, may create the appearance that Oaknoll will be unfairly influenced to do business or continue to do business with that vendor. You should thank the vendor and politely decline the offer. Please contact the Compliance Officer with any questions or concerns.*

Social Media

The internet provides many opportunities to participate in interactive discussions, or to share information, using a variety of social media; such as email, blogs, Facebook, etc. Oaknoll recognizes the information, comments or opinions placed on social media sites can impact the public views of our delivery of care and treatment to residents, employees, and contractors. Oaknoll is committed to ensuring the use of such communications serves the needs of our business by maintaining our identity, integrity, and reputation in a manner consistent with these Standards of Conduct and policies.

In addition, an employee's use of social media can pose risks to Oaknoll's confidential and company owned business information and can jeopardize compliance laws and regulations. To minimize these risks, to avoid loss of productivity and loss of employee's job performance, and to ensure that Oaknoll's Information Technology systems are used only for business purposes, we have established policies set forth in the Employee Handbook, page 15.

ASKING QUESTIONS AND REPORTING CONCERNS

Compliance Hotline Number: 319-466-3069

Compliance Email: compliance@oaknoll.com

Compliance fax: 319-466-3023

Each employee's willingness to report concerns is an important part of the effectiveness of the Oaknoll Compliance Program.

We are each responsible for reporting, in good faith, potential wrong-doing and/or non-compliance with regulations, laws or policies.

All reported concerns are to be taken seriously and the process of investigating all matters is to be handled with professionalism and confidentiality. Investigations are to be conducted discretely with the intended purpose of identifying any possible non-compliance. They should include identifying the root cause with developing and implementing actions plans to correct and avoid any reoccurrence. It is not acceptable to overlook actual or potential wrong doing and all integrity concerns should be pursued until addressed appropriately.

Oaknoll has an open door policy and encourages employees to share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if speaking with the supervisor puts an employee in an uncomfortable situation, the employee is encouraged to speak with the Chief Human Resource Officer, the Administrator, or the Executive CEO.

In suspected fraud, or for cases in which the employee is not satisfied or is not comfortable with the open door policy, a report should be made directly to the Oaknoll Compliance Officer. The Audit Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Audit Committee Chair of any such complaint.

Supervisors and Managers are required to report suspected violations to the Oaknoll Compliance Officer. If the Compliance Officer is not available, chair of the Board of Directors Audit Committee may be contacted (see below).

Corporate Compliance Officer

Attn: Taylor Wheeler

1 Oaknoll Court

Iowa City, IA 52246

Compliance Fax:

319-466-3023

Compliance Hotline:

319-466-3069

Compliance Email:

compliance@oaknoll.com

Audit Committee Compliance Officer:

Jeanette Hall

2407 Mayfield Road

Iowa City, IA 52245

319-430-7607

jhall@midwestone.com

Other Audit Committee Members:

Sheila Boyd

sheilaaannboyd@gmail.com

Jim Cantrell

jcantrell@midwestone.com

Management Staff:

Steve Roe

CEO

Work: 319-466-3006

Cell: 319-530-8081

Email: sroe@oaknoll.com

Krissy Gilbreth

Chief Human Resources Officer

Work: 319-466-3005

kgilbreth@oaknoll.com

Problem and Solution

What if I am not comfortable reporting a compliance concern to my immediate supervisor?

- *Employees are encouraged to discuss concerns with their immediate supervisor. However, there are a variety of reporting options available to you. Concerns may be reported verbally or in writing. See the hotline number and email above. If you have any questions, please contact the Compliance Officer.*

If an employee seeks anonymity in reporting a concern, Oaknoll has the Compliance Hotline that may be used. It is available 24 hours a day – seven days a week, for individuals to report any compliance related concerns. Oaknoll's Compliance Officer will respond to reports as quickly as possible. All concerns reported to the hotline will be taken seriously and addressed to the fullest extent necessary.

Visitors, families or residents, and residents are also encouraged to report any concerns to the appropriate provider or to the Hotline as well.

In addition to internal reporting methods, any individual who has concerns about the safety or quality of care provided may report these concerns to an appropriate federal or state agency.

The Elder Justice Act, as defined in Section 6703 (b)(3), requires Oaknoll to inform our volunteers, employees, and contract staff of their obligation to report any reasonable suspicion of a crime committed against any resident receiving care. Oaknoll supports reporting suspected crime to the appropriate local agencies and to the Secretary of the Department of Health and Human Services or their designee. Questions should be referred to the Compliance Officer.

Whistleblower Protections and Non-Retaliation

In order to protect Oaknoll board members, officers, volunteers and employees, Oaknoll follows all whistleblower and non-retaliation laws and policies. Retaliation, whether actual or threatened, may destroy the trust that is central to a high quality organization.

- Whistleblower: means any person who in good faith reports real or perceived related misconduct.
- Good Faith: means reporting Oaknoll related misconduct based on known facts and a belief that it is true.
- Retaliation: means any negative or inappropriate action or threat made by an Oaknoll employee, in response to a good faith report of misconduct.

No one who reports a suspected violation shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a suspected violation in good faith is subject to discipline up to and including termination of employment. This policy is intended to encourage and enable employees

and others to raise concerns within the organization prior to seeking resolution outside the organization.

The Compliance Officer will notify the sender and acknowledge receipt of the reported suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

RESOURCES AVAILABLE

Training and Educational Opportunities

Oaknoll recognizes that education and training are critical to the provisions of quality care and services, accurate billing practices, and to ethical and legal business operations.

Oaknoll provides new hire general compliance training, specific or role based training and ongoing/periodic education and training.

Examples of additional references to specific laws and regulations are as follows:

- Title XVIII of the Social Security Act
- Medicare regulations governing Parts C and D found at 42 C.F.R. §§ 422 and 423 respectively
- Patient Protection and Affordable Care Act (Pub. L. No. 111-148, 124 Stat. 119)
- Health Insurance Portability and Accountability Act (HIPAA) Public Law 104-191
- Elder Justice Act Section 6703(b)(3)
- False Claims Acts (31 USC §§ 3729-3733)
- Fraud Enforcement and Recovery Act of 2009
- Medicare and Medicaid Anti-Fraud and Abuse Amendments (42 USC §1320a-7b)
- Federal Health Care Program False Statements (18 USC §1035)

REMEMBER

Any suspected violation of health care fraud, waste or abuse MUST be reported to the Compliance Officer immediately at the Hotline: 319-466-3069.