



**Annual Code of Conduct and Corporate Compliance Communication**

August, 2021

To All Residents and Resident Families,

The last year and a half has been challenging, to say the least. We thank you for continuing to trust us and support our mission to serve and take care of the most vulnerable in our community.

Cobble Hill Health Care is committed to helping eliminate fraud, waste and abuse. This includes any dealings with Government Health Insurance. We expect all of our employees, vendors and all those with whom we do business practice the same.

Enclosed is a summary of our Code of Conduct as part of our Corporate Compliance Program which provides information regarding expectations and standards of how we operate and do business. All employees, independent contractors and Board Members receive the full policy and associated training.

Cobble Hill has a Corporate Compliance Program led by our Corporate Compliance Officer, Katie Ivie, Chief People Officer (CPO). Should you have any questions regarding our Code of Conduct and Compliance Policies or if you know of any fact or situation you about which you feel we should be aware, please contact Katie at 929-409-5026, email at [kivie@cobblehill.org](mailto:kivie@cobblehill.org), or you may call anonymously to 718-855-6789 x262.

We take all concerns seriously and will conduct a thorough investigation accordingly.

Thank you for your cooperation and partnership.

Sincerely,  
The Cobble Hill Team



## CODE of CONDUCT/CORPORATE COMPLIANCE POLICY SUMMARY

The following summary identifies the various topics covered within Cobble Hill's Corporate Compliance Policy and Code of Conduct along with a brief description of each. Copies of the full policy are available by request at any time.

The Facility has built a reputation for the reception and care of ill and aging persons without regard to race, creed, age, national origin, marital status, disability, or sexual preference, or any other protected category.

We are committed to providing the care and services necessary to attain or maintain the Residents' highest practical, physical, mental and psychosocial well-being, with integrity as the fundamental guiding principle for our employees, agents, and vendors while respecting the dignity, worth, and uniqueness of each individual who comes to the Facility.

1. Written Policies and Procedures
  - a. Code of Conduct – Our policy outlines the standard to which we hold all those associated with Cobble Hill.
  - b. Ethics – Our policy outlines the behavior that is expected of all employees in the performance of their duties, including Residents' Rights, patient dignity, confidentiality and managing conflicts of interest.
  - c. Operating Policies and Procedures are reviewed annually.
  - d. Employees are trained and evaluated against these policies and procedures regularly.
2. Designation of a Compliance Officer and Corporate Compliance Committee
  - a. We have a designated Compliance Officer
  - b. The Compliance Officer ensures adherence to the Corporate Compliance policies and procedures, including reporting, identifying, investigating, training and expectation setting for all related topics.
  - c. We have a Corporate Compliance Committee that meets quarterly to review and discuss any updates, requirements, and/or changes.
3. Development and presentation of Regular and Effective Education/Training Programs
  - a. We have training programs in place for on-going education as well as new hire training.
  - b. Training needs are identified through Quality Assurance Checks and observations.
  - c. Training includes how to appropriately report any issues or violations of the Corporate Compliance Policy.
4. Effective Lines of Communication
  - a. Details are provided on who the Corporate Compliance Officer is and how to contact her.
  - b. Specifics are listed regarding the anonymous hotline, when, and how to report any violations.



5. Audits and Monitoring
  - a. Audits are done regularly to ensure all aspects of the Corporate Compliance Plan are functioning correctly.
  - b. There is a Quality Improvement Team, known as QAPI, that monitors and measures the care provided to residents at the facility.
  - c. Legal and financial audits occur in partnership with attorneys and CPAs to monitor contracts, legal issues, claims and billing criteria.
  - d. Other audits are conducted as necessary to ensure compliance and program efficacy.
6. Enforcement Standards and Penalties for Violations
  - a. The Standards, Procedures and Policies of this Corporate Compliance plan will be enforced through appropriate corrective and disciplinary action consistent with our practices.
  - b. Similar disciplinary action will be taken against “non –employees” consultants, Medical/Dental staff, Fee for service providers and vendors
7. Responding to Detected Offenses and Developing Corrective Action
  - a. The Corporate Compliance Committee will initiate the investigation process, utilizing staff, the Compliance Committee, HIPPA/Corporate Compliance consultant, auditors and other experts to assist in the investigation as needed.
  - b. Elements of what goes in to the investigation process are defined and the Corporate Compliance Officer is responsible to ensure those steps are followed along with any Security concerns.
  - c. The findings of such investigations will follow the appropriate agency notifications.
8. No Retaliation, Discrimination or Harassment
  - a. Cobble Hill has a no retaliation, discrimination and harassment policy covering all behaviors in the facility.
  - b. As it relates to Corporate Compliance and our Code of Conduct, specifically, no employee will suffer retaliation, discrimination or harassment for reporting fraud, waste or abuse or other Whistleblower activity.

This is a high-level summary of the Code of Conduct/Corporate Compliance Program. The full version is available to you at any time by request.