

*Quality service and
ethical conduct
go hand-in-hand
at Willow Brook.*

What is the Corporate Compliance Program?

Willow Brook is a Christian ministry. In all that we do, we want to maintain the highest standards of ethics and values, always in keeping with both the letter and spirit of the law.

The Compliance Program is designed to ensure that we live up to the values we profess. Through it, we educate staff and others affiliated with us with regard to:

- Our values.
- Our expectations of conduct and behavior.
- Our expectations of compliance with laws and regulations.

What's more, the Compliance Program provides an opportunity for you and others to report suspected misconduct and violations of law. And, you may even do so anonymously.

We so very much appreciate your partnership in our efforts to conduct ourselves always in accordance with the highest values.

Frequently Asked Questions

Who is responsible for the Corporate Compliance Program?

The compliance officer works with a committee of key leadership staff, and reports findings to the board.

The compliance officer also conducts an annual risk assessment and makes recommendations.

How can I see compliance policies?

Policies are detailed in the Code of Conduct and are accessible in print from the Human Resources department and on Willow Brook's company web and public website at www.willow-brook.org



Willow Brook Christian Communities

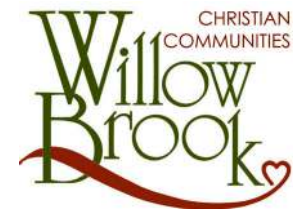
100 Delaware Crossing West

Delaware, OH 43015

740-201-5640

Compliance Hotline

888-850-2484



Serving with Integrity

*Willow Brook's Corporate
Compliance Program*

Willow Brook's Corporate Compliance Program

Quality service and ethical conduct go hand-in-hand at Willow Brook. We are serious about our commitment to values and compliance with the law. We wish to always act with integrity in our relations with staff, residents, and the community at large. In short, we want to treat others as we wish to be treated.

And, we want to meet the full expectations of our governing board, regulating government bodies, and our God.

The Corporate Compliance Program sets forth a Code of Conduct that applies to everyone at all levels of the organization. We pass it out and discuss it at orientation, and review it at least annually with all staff.

The Compliance Program contains eight key elements:

- Written policies, including the Code of Conduct.
- Designation of a compliance officer and compliance committee.
- Training and education.
- Communication methods for reporting violations.
- Auditing and monitoring.
- Response to suspected violations.
- Enforcement of disciplinary standards.
- Policy of non-retaliation.

The Compliance Program is designed to ensure that we live up to the values we profess.

Monitoring the Corporate Compliance Program

Ongoing monitoring and audits are performed by the compliance officer and/or internal auditors, including the following areas:

- Billing, reimbursement, and resident accounts
- Quality of care
- Environment and safety
- Information privacy and security
- Corporate/legal processes
- Exclusions, sanctions, and provider credentialing
- Other areas, including purchasing practices, contracts, business associate agreements, and human resources

What to do if you believe the Code of Conduct is being broken

If you believe you have seen a violation of the Code of Conduct, state or federal rules, or policies and procedures, you have an obligation to report it. You may use the same system to report HIPAA privacy issues or any act of fraud, waste, or abuse.

You can report violations in three ways:

- Go to your supervisor, or, if necessary, up the chain of command.
- E-mail compliance@willow-brook.org.
- Make a call (anonymously, if you prefer) to the Compliance Hotline 888-850-2484.

After the report is made, the compliance officer will determine if an investigation is warranted. If it is, the officer will conduct an investigation, ensuring that confidentiality is protected. Legal counsel or other assistance may be enlisted if necessary.

After the investigation is completed, the compliance officer will submit any necessary reports and ensure that appropriate corrective action is undertaken.

There will be no retaliation for making a report in good faith.

**Compliance Hotline
888-850-2484**