

**Can I see SCNR's complete policy about matters of fraud, waste or abuse, as well as the full text of the laws that govern such matters?**

Of course, and we urge all employees to do so. The Corporate Compliance Plan, as well as full summaries and wording of the False Claims Act, the Program Fraud Civil Remedies Act, the Civil Penalties NY Social Services Law 145-b, the Health Care Fraud Penal Law 177, and the Whistleblower Protections Labor Law 740 are available in Human Resources or on the Intranet (<http://silverintra>).

**Suspect Waste? Fraud? Abuse?**

**Report Concerns 24 hours a day  
You don't have to give your name  
No retaliation, no retribution**

**If you suspect a violation  
please report it to the hotline**

**Your Call Matters  
Report Concerns Toll-Free  
1-888-308-4435**

**We Can't Do It Without You**

**Si Usted habla español,  
por favor llama 1-800-297-8592**

**The Silvercrest Center for Nursing and Rehabilitation**

is a unique center of excellence, dedicated to Giving Quality to Life for all whom it serves, including:

- ◆ Older and younger adults who are chronically ill or traumatized and who make Silvercrest their home.
- ◆ People who need rehabilitation before returning to an independent life.
- ◆ Ventilator-dependent patients who require weaning from ventilation.
- ◆ People with Alzheimer's Disease and other dementias who need a nurturing and safe environment that promotes functioning.

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Member  
**NewYork-Presbyterian Healthcare System**  
Affiliate: Weill Medical College of Cornell University

The  
**Silvercrest**  
Center  
for nursing  
and rehabilitation

**Giving Quality to Life**

**Preventing  
Fraud, Waste  
and Abuse  
Guidelines for Employees**

# Preventing Fraud, Waste and Abuse

## What is an individual employee's duty regarding fraud, waste or abuse?

The Silvercrest Center for Nursing and Rehabilitation (SCNR) aspires to the highest level of personal and professional ethics. It is our explicit policy to conform to all laws and regulations that apply to the conduct of our business and to the care of our residents and patients.

Every individual employee—including members of the medical staff, the governing Board, vendors, volunteers and other individuals who act on behalf of SCNR—must:

- ◆ Comply with all laws and regulatory requirements.
- ◆ Keep accurate records.
- ◆ Be truthful.
- ◆ Behave ethically and without conflict of interest.
- ◆ Report possible violations.

## What is a compliance program?

SCNR maintains a vigorous compliance program to detect and prevent fraud, waste and abuse, and strives to educate its work force on fraud and abuse laws, including the importance of submitting accurate claims and reports to Federal and State governments and other payers.

SCNR has a Compliance Officer, who oversees these programs and, when necessary, works collaboratively with the NewYork-Presbyterian Healthcare System-wide Corporate Compliance Program and Office of the General Counsel to conduct investigations in these areas.

## What practices and policies should I be concerned with?

A full text of the following policies is available in Human Resources or on the Intranet (<http://silverintra>):

- ◆ Proper use of SCNR and SCNR name.
- ◆ Conflicts of interest.
- ◆ Trade practices and antitrust.
- ◆ Improper inducements.
- ◆ Billing for services.
- ◆ Taxes.
- ◆ Fundraising.
- ◆ Hiring; equal employment opportunity; labor and employee relations; substance abuse.
- ◆ Environmental health and safety.
- ◆ Pharmaceuticals.
- ◆ Protection of human research subjects.
- ◆ Political participation and lobbying.
- ◆ Records—confidentiality and safeguarding of information.
- ◆ Copyright laws.
- ◆ Government investigations.
- ◆ Professional licensure and registration.

## What is my duty regarding reporting of possible violations?

As part of the commitment to ethical and legal conduct, employees are required to immediately inform the organization about any suspected improper conduct.

## What should I do if I have concerns about improper conduct?

You should immediately bring your concerns to the attention of your supervisor, the Compliance Officer or the Administrator. Employees may also call the Compliance Hotline at 1-888-308-4435 to discuss concerns about possible violations of the law or institutional policy. This hotline is open 24 hours a day, and you can report your concerns anonymously without retaliation or retribution. You may also report your concern directly to the New York State Department of Health or to the Joint Commission.

## What occurs when I raise a concern?

SCNR is committed to investigating any allegation of fraud, waste or abuse swiftly and thoroughly and will do so through its internal compliance programs and processes. To ensure that the allegations are fully and fairly investigated, all employees must fully cooperate.

SCNR devotes substantial resources to these investigations and, therefore, believes that all employees should bring their concerns to the institution first so we can address and correct any improper activity. While any employee of SCNR who reports such information will have the right and opportunity to do so anonymously and will be protected against retaliation for coming forward with such information both under SCNR internal compliance policies and procedures and Federal and State law, SCNR does retain the right to take appropriate action against an employee who has participated in a violation of Federal or State law or facility policy.

While SCNR requires that its employees bring their concerns to management, certain State and Federal laws provide that any private citizen may bring their concerns of fraud and abuse directly to the government. Please note, however, that if an employee never reports his or her concerns through SCNR's internal compliance processes so that SCNR can address these concerns, they will be in breach of their duty to SCNR.