

RE: Deficit Reduction Act of 2005 (“DRA”) Education Requirements
Reporting Reasonable Suspicion of a Crime in Long-Term Care Facility
Government Exclusions Checks

Dear HCR ManorCare Contractor or Agent:

Federal and state laws require providers to educate their contractors and agents regarding certain laws and policies. Information about the following three items can be found on the company’s website: www.hcr-manorcare.com under the Vendor Policies tab.

1. DRA Requirements:

The DRA requires providers to supply information regarding the Federal False Claims Act, administrative remedies for false claims and statements, applicable state false claims provisions and whistleblower protections under these laws. The Standards of Business Conduct (“Standards”) is the company’s policy for the prevention of health care fraud, waste and abuse.

2. Reporting Reasonable Suspicion of a Crime:

HCR ManorCare is committed to the safety of its patients and ensuring that reasonable suspicion of crimes is properly reported in accordance with the law. The company has a policy that requires the reporting of crimes against patients to local law enforcement and the state survey agency. Key information regarding these requirements include the Centers for Medicare & Medicaid Services (“CMS”) memo dated 6.17.11, which was revised 1.20.12, and a document outlining the company’s reporting expectations.

3. Government Exclusions Checks:

It is the policy of HCR ManorCare to perform checks on employees and contractors to ensure that any payments received from state or federal funds are not for items or services that are directly or indirectly furnished, ordered directed, managed or prescribed in whole or in part by an excluded, unlicensed or uncertified individual or entity.

Please provide this information to all employees and agents who have contact with the company’s business units. It is the company’s expectation that you and your employees and agents will abide by these Standards, policies, and all federal and state rules, regulations and laws in the provision of services rendered to the company.

Please contact me via e-mail at CorporateCompliance@hcr-manorcare.com, if I can be of further assistance.

Sincerely,

Daniel H. Kight
Vice President, Treasurer and
Chief Compliance Officer