

Crown Heights Center for Nursing and Rehabilitation

Compliance Program

Date: March 1, 2023

Dear Associate:

St. Marks Brooklyn Associates, LLC d/b/a Crown Heights Center for Nursing and Rehabilitation (“Crown Heights”) is dedicated to conducting its business honestly and ethically and in compliance with applicable laws and regulations. In order to meet this commitment, Crown Heights has set forth in this Code of Conduct the principles and rules to be followed by all Members, Managers, senior administrators, employees, agents, physicians, volunteers, contractors, subcontractors and independent contractors, associated with Crown Heights (“Associates”). The Code of Conduct also includes the information required by the Deficit Reduction Act (DRA), including a summary of Federal and State False Claims Acts, State health care fraud laws, applicable State and Federal whistleblower protections, and applicable policies for detecting fraud, waste, and abuse with which you must comply.

The purpose of this Code of Conduct is to inform all Associates and interested third parties that Crown Heights is fully dedicated to approaching all of its activities in accordance with the highest ethical, business, and legal standards. The Code of Conduct will familiarize new Associates with the ethical standards that guide our business and patient relationships in our highly regulated environment. For existing Associates, it will reaffirm our commitment to ethical behavior in all circumstances. Since everyone at Crown Heights has a personal stake in this important program, we strongly urge you to review this information thoroughly and refer to it whenever situations arise requiring you to exercise your judgment.

Compliance with laws, regulations and our policies requires the full commitment of all Associates. Each of us is personally and professionally responsible for understanding and adhering to this Code of Conduct and the supporting policies and procedures, including those areas covering your specific functions and responsibilities. While the Code of Conduct will provide guidance in addressing ethical and compliance issues, it cannot cover every situation that you may encounter. If you have a compliance question or encounter a situation that concerns you, you should discuss the issue with your department supervisor, the Administrator and/or the Compliance Officer. You may also report any issues or concerns in writing or by calling the Compliance Hotline. Hotline calls may be made anonymously. Contact information to make any compliance reports and the Hotline number can be found in the enclosed Code of Conduct and Compliance Posters displayed in the facility. Compliance reports will be held in the strictest confidence possible.

Celideth Collins
Compliance Officer