



## **The Employees' Handbook**

SENIORAVENUE LLC  
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## INTRODUCTION

This employee handbook provides the purpose, the values and the principles of Senioravenue LLC and summarizes the most important policies. The primary elements are of utmost importance for respect and proper conduct for every individual in call for common prosperity. The manual applies to all employees and offers clear and relevant expectations of conduct and the important tools for dealing with any potentially delicate situation. Our main goal is to improve the lives of our clients.

Senioravenue LLC is built through character of the employees. Senioravenue LLC's values – which are important for our success – reflects the character. For Senioravenue LLC to succeed more, everyone has to do his/her part and make the relevant decisions.

We have prepared this handbook to inform employees of our policies and procedures and to establish our expectations. Its purpose is not to offer strict policies interpretation but to offer a general overview of our work environment. It is not a contract, implied or expressed, guaranteeing employment for a certain length of time and it should not induce employees to accept employment.

Senioravenue LLC has the rights to unilaterally suspend, revise, revoke change or terminate any of its policies, in part or in whole, whether described in this handbook or elsewhere. If a discrepancy between the current Senioravenue LLC policies and this handbook arises, you should conform to the current policies. We will make every effort to ensure that you are informed of changes in policies.

## **COMPLIANCE WITH THIS HANDBOOK**

All governing body members, the management, and the employees have a responsibility of complying with the state and professional standards and the policies/regulations. That is with an aim of ensuring that the care we provide to our clients and our business interactions are reflecting ethical conduct and integrity. We should be determined to do the best at whatever matters most.

## **THE SCOPE OF OUR SERVICES**

Senioravenue LLC offers private homecare services to our many clients who are always determined to be medically compromised/medically fragile and who require help in their homes. We also offer help to communities to ensure that they are maintaining and retaining their well-being and independence. Our services generally include:

## **PERSONAL CARE TASKS**

Only qualified Caregivers shall perform personal care tasks. They should also do that under the directions of a supervisor. Their services should also adhere to the client's service plan. Apart from following the client's service plan, Caregivers should prepare a report on the client's personal care needs, changes on the condition of the client and any other observed problem that can affect the client.

## **COMPANION OR SITTER TASKS**

Only qualified companions or sitters under a qualified supervisor's directions should perform companion or sitter tasks. They should follow a service plan and report the needs of the client, the changes in the general condition of the client and any other observed problem that may affect the client.

## **REPORTING COMPLAINTS AND INCIDENT**

1. Anyone dissatisfied or with a complaint/grievance, has a right to bring the matter to the Senioravenue's attention.
2. If an employee is suspecting that a client is dissatisfied about something, he/she should inform the supervisor as early as possible.
3. The raise of complaints, disputes, grievances or issues should never affect our offering of services to clients.
4. Employees may make complaints in writing or verbally by telephone, by letter, in person or by other means.
5. Complaints will be responded to within two working days or before the next scheduled service visit, whichever comes first.
6. Senioravenue shall address all complaints/grievances immediately and take steps to resolve all issues including giving verbal or written apologies or changing a policy, behavior or practice.
7. Senioravenue shall handle complaints in the sternest of confidence.
8. Senioravenue shall keep a record of every complaint/grievance received in the office. That includes the investigations and actions taken.

9. Complaints/grievances that Senioravenue is asked to review shall use the following procedure:

- (a) The person (s) wishing to make the complaint will take the Senioravenue's Complaint Grievance form.
- (b) The person (s) making the complaint/grievance shall speak with the involved staff member, as early as possible.
- (c) If the staff member involved does not resolve the complaint/grievance, the person (s) involved shall make complaints to the supervisor. The supervisor shall try to resolve the issue as fast as possible.
- (d) If the complaint/grievance remains unresolved or the person (s) making the complaint prefer to speak with the Administrator/Manager, the person (s) making the complaint and others involved shall contact the Administrator/Manager.
- (e) The manager/administrator shall try to find the dissatisfaction cause and work with the person (s) making the complaint to come up with a solution.

## HANDLING OF ABUSE

Abuse is a knowing, deliberate or negligent act by caregivers or other person (s) that causes serious risks of harm or hurts a vulnerable client. Any mistreatment that falls in any of the following classes is a client abuse:

1. Any Emotional Battering, which inflicts pain, distress, or anguish through threats, harassment, intimidation, or any other verbal or non-verbal action;
2. Financial Exploitation, which is an illegal or improper use of client's funds, property or assets for personal benefits;
3. Neglect, either physical or emotional - including isolation, confinement, or denial of an essential service;
4. Abandonment occurring after a caregiver responsible for offering support abandons the client;
5. Self- Neglect occurring when a person fails to care for his/her health and safety needs and as a result puts him/herself at a great risk of injury or illness;
6. Physical assault including any violence or physical force that leads to an injury, physical pain or impairment to the body;
7. Sexual abuse that involves non-consensual, sexual contact including in situations where a person is unable to give consent; and
8. Healthcare abuse including activities like getting kickbacks for a referral, not offering healthcare but charging for it, and double billing for a service.



## **ABUSE REPORTING PROCEDURES**

The employees shall report to the supervisor any suspicions of a client abuse or alleged acts of client abuse. If possible, they should obtain a client's written consent to report an alleged abuse. Nevertheless, if he/she is unwilling to cooperate, they should still report the surmised abuse. In case of an immediate danger, an employee should call 911 or the emergency number of the local police or the local emergency hospital.

If the client is not in immediate danger, the employee should notify the supervisor and the supervisor should ensure that the supposed abuse situation is reported to the local law enforcement (if the abuse is physical, sexual or involving fraud or theft) as the form of abuse is criminal. If the alleged abuse is in any other form, they should report to the appropriate client authority.

If Senioravenue believes that a client has/is a victim of abuse by any of its employees or by an employee, it has placed; it should immediately remove the employee from direct contact with the client, and start investigating the allegations within a period of 14 days after the notification. They should also contact the local law enforcement agencies when the abuse is physical, sexual or involving fraud and theft, as the abuses are criminal in nature.

Senioravenue should also complete an incident report, give copies to the local law enforcement (when the abuse is of criminal nature), and to file with the appropriate client neglect and abuse agency within the area the client lives. Senioravenue should also send a copy to the Department regulating the licensing of agencies and keep one at its Agency Office.

Any written report of an alleged abuse should include the Senioravenue's name, address and the telephone numbers. It should also include the name, address and the telephone number of the allegedly abused client. Other things to include in the file are the date(s), and the time(s) of the alleged abuse. In the report, Senioravenue should also describe the effect/injury and identify all agencies and/or people they questioned and those notified about the abuse. The actions Senioravenue took and the plans they developed to prevent such abuses in the future should appear on the form.

## THE STANDARDS OF CONDUCT

The service Senioravenue LLC should consider the unacceptable conducts to include, but not limited to:

Falsification of personal education and/or the experience information during job application process; Falsification of job and character references during a job application process; Having previous convictions or receiving convictions for committed crimes; Falsification of the data on the clients charts and any other Senioravenue LLC records; Falsification of information on billings for the client services; Use of codes which violate the federal rules/regulations; Destruction or alteration of Senioravenue LLC and client records without permission; Exhibiting a behavior that reflects badly on Senioravenue LLC; Possessing, using, or/and being under influence of alcohol or an illegal substance during working hours; Being ignorant to co-workers, clients health care YOUR Home Cares and any other member of the community; Possessing a dangerous weapon or a gun during the work hours; Doing a malicious damage to clients or Senioravenue LLC's property; Stealing from a client or Senioravenue LLC; Conducting activities/actions that are dishonest in some way; Disclosing a client's name, address, phone number and any other personal information to the non- Senioravenue LLC employees without prior permission of the client; Disclosing confidential information without prior authorization or without a legal direction to do that; Accepting money or inappropriate gifts from a client without approval from compliance officer/designee; Engaging in a financial transaction with clients other than the required; Timekeeping: caregivers will be required to clock in/out using our telephony system Employees shall wear agency employee ID badge throughout when working. Employees will go through a non-paid orientation before being assigned to work with clients and they shall sign a document contain the policies and procedures to confirm their attendance; Bringing children, pets, or an unauthorized person to a client's home while doing the job duties; and, Absenteeism without permission or without advising the supervisor, when you can be able to do that. Conflicts of interest

All service Senioravenue LLC should follow and enforce conflict of interest policy. Every member of the governing body, employees and the management should highly avoid perceived or potential conflicts of interest that can develop when they have a personal interest that competes with their employment with Senioravenue LLC. The conflict could also develop when they have authority positions in Senioravenue LLC that conflict with their personal interests in any other organization and when they have conflicting responsibilities.

To be sure that the relationships of Senioravenue LLC's business are void of any inappropriate influences, the governing body members, the management and employees will have to disclose the potential conflicts of interests. To that, they should complete and sign a conflict-of-interest statement.

### **CONFIDENTIALITY**

Senioravenue LLC is always committed to appropriate protection of client's confidential information and it therefore enforces the Confidentiality and Privacy of Information policy. Various members of staff have access to different types of confidential, sensitive and medical information that we maintain to serve health care Senioravenue, our clients, Senioravenue LLC and the third-party payers in conformity with the legal, regulatory and accrediting requirements.

Senioravenue LLC policy forbids unauthorized disclosing, giving or seeking of such information, which include the confidential information contained in the client's records. However, a consulting physician, a healthcare professional or an employee who provides client service or a third-party payer may access the information on a need-to-know basis. The activities, operations, finances, and the business of Senioravenue LLC shall remain confidential and only the authorized persons will be able to access it.

### **PERSONNEL FILES**

Senioravenue LLC maintains personnel files for all employees. The files shall remain confidential to the possible extent. It is crucial that a personnel file represents the personal information of an employee accurately. Therefore, an employee should inform YOUR AGENCY of any changes in name, address, home address, home telephone numbers, and number of dependents, marital status or emergency contact information.

### **SENIORAVENUE LLC'S PROPERTY**

Employees should not use Senioravenue LLC's property including vehicles, equipment, computers, telephones and software for personal benefits. They should strictly use them for Senioravenue LLC's business. Furthermore, they should use it in the intended manner and upon job termination; an employee should surrender any property he/she possesses.

### **NON-DISCLOSURE AGREEMENT**

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It is a requirement that all employees will keep some Thoughtful Home Care information confidential and only share it with people who are in a “need-to-know” position. Employees shall practice high confidentiality levels to protect client’s lists; compensation/salary; benefits; performance appraisals; non-public business information; disciplinary actions; and trade (proprietary) secrets. Every employee shall sign a Non-Disclosure Agreement after we have hired him/her. Failure to comply with the provisions can lead to a disciplinary action up to and even termination of the employment.

### **BUSINESS ETHICS**

We are committed to uphold the highest level of integrity and business ethics. The management, members of the governing body and all employees shall conduct themselves professionally. Therefore, they shall not falsely represent Senioravenue LLC, or defraud people property, money or candid services. Also, they shall not make misleading or false comments about employees, services, Senioravenue LLC, competitors, business contacts or the competitors services.

Employees shall not participate in an activity intended to obtain Senioravenue LLC services inappropriately or to offer services to Senioravenue LLC through intimidation, payment or enticement. What’s more, they shall not engage in a corrupt practice directly or indirectly or offer compensation to other person (s) for improper or unlawful purposes.

### **REPORTING AND RECORDING EXPOSURE TO TUBERCULOSIS AND HEPATITIS**

Every member of staff shall report exposure to tuberculosis or hepatitis. That will help ensure that Senioravenue is taking the measures necessary to reduce risks of infection resulting from exposure to a blood-borne disease, to investigate and to document any circumstance surrounding the exposure, and if necessary, ensure that the exposed employees have received medical consultation, treatment and follow-up in a seasonable manner.

### **REPORTING AND INVESTIGATION OF VIOLATIONS**

Members of staff shall be responsible for reporting violation of laws, Senioravenue LLC Home Care policies or regulations and the Standards of Conduct procedures. Employees shall report any violation that they already know or if they think another organization/person related to Senioravenue, is committing, has committed, or may commit to the Designee/Compliance Officer immediately. Senioravenue LLC shall protect the employee's anonymity.

The Designee/Compliance Officer shall investigate and then document each allegation of wrongdoing or misconduct immediately. They shall do this by conducting interviews, reviewing comparative documentation or evaluating the circumstances and facts.

They shall consider the degree of the behavior variation from the Standards of Conduct, seriousness of that behavior, the work history of the involved employee and any other relevant information and data.

### **DISCRIMINATION AND HARASSMENT**

Senioravenue LLC shall treat all individuals equally without prejudice or bias, in part, through the enforcement of policies relating to age, ethnic origin, sexual orientation, disability or military service. The governing body members, employees, management shall maintain and promote a more productive work environment free from discrimination, harassment or disruptive activities. There will be no toleration of any form of discrimination or harassment. Any client (s) that experience discrimination or harassment on the aforementioned basis shall report to the Designee/Compliance officer immediately. Senioravenue LLC forbids retaliation against people who make complaints of discriminatory or harassing conduct.

### **RETALIATION**

Senioravenue LLC is more committed to non-compliance disclosure. It therefore forbids taking actions against members of the management, governing body, or employees for making reports. It is the responsibility of employees to report potential or actual wrongdoings and therefore Senioravenue LLC shall not allow consequential revengeful or retaliative or a harassing activity/action against a report. Anyone involved in a retaliation measure shall be subject to disciplinary action in conformity with Senioravenue LLC's Disciplinary Action Policy or as the law dictates. If a member of staff reports his/her inadequate or inappropriate action/activity, he shall remain subject to disciplinary action.

### **COMPETITION**

Senioravenue LLC will always comply with the state and federal monopolies (antitrust) laws and regulations. Therefore, Senioravenue LLC shall not give charges that collide with the competitors or share confidential information with a competitor. Furthermore, no staff shall share confidential information with a competing service Senioravenue LLC (such as charges for the services offered or salaries).

To take anti-competitive measures or minimize competition, Senioravenue LLC will start by obtaining legal counsel. Communication with a competitor relating to matters that can be interpreted as an attempt to minimize competition or to fix prices, shall only take place after consulting a legal counsellor.

### **WORKPLACE SCRUTINY**

Employees should not presume that items or parts of their work or work-related environments are private and off-limits to the management. Therefore, they should not bring personal materials or possessions that are private and confidential to the workplace. Senioravenue LLC Supervisors have authority to conduct impromptu or unannounced searches of Senioravenue LLC property, office and equipment. The aim of doing that is to promote a safer working environment to all members of staff; to help enforce Senioravenue LLC's Drug and Alcohol Policy; to help create a dependable, constructive and efficient staff pool to service clients; and to help in effective Compliance Program operation. Furthermore, the supervisors have authority to access or monitor notebooks, computers, and any Senioravenue-issued electronic device as a way of ensuring that the employee is using it in a reasonable and responsible way (that includes the internet and email).

### **FINANCIAL TRANSACTIONS**

Senioravenue LLC shall charge, bill, document and submit any claim for services reimbursement in a manner that the applicable laws, regulations and rules require. Therefore, every member of staff should be aware and carefully follow the applicable rules for bills and claims submission for reimbursement on Senioravenue LLC's behalf. Members of staff shall:

Not copy, possess or distribute Senioravenue LLC documentation that they should not have in-hand for their duty's performance. Issue a financial report only to persons holding need-to-know positions. They shall only do that using protected retrieval and distribution methods. Make only documents Senioravenue LLC and the law requires for proper conduction of business. Ensure that any claim to payer such as Long-Term Insurance, Medicaid, third-party payers or the client correctly reflect the supplies, equipment and

services rendered. Record every supply, equipment and service they provided to a client. Record billing information and their communication with a third part including a healthcare professional; Document accounting records, time sheets, expense accounts and any other document accurately and definitively; and Support cost reports with confirmed documentation.

Any knowledge or suspicions of misleading, incorrect or false claims or records shall be reported to the Designee/Compliance Office immediately.

### **EXTERNAL AUDITS**

Senioravenue LLC is devoted to cooperating with the government organizations, as the law requires. If any employee receives a search warrant, subpoena, or any other similar documentation, he/she shall contact the Designee/Compliance Officer, supervisor or manager before acting. The Designee/Compliance Officer, supervisor and/or manager are responsible for authorizing copying or release of documents. If an agent, auditor or government investigator comes to Senioravenue LLC, an employee shall contact the Designee/Compliance officer, manager or supervisor before discussing any matters with the agent, auditor or investigator.

### **INDEPENDENT CONTRACTORS**

Every independent contractor that offers a service(s) to Senioravenue LLC shall comply with the relevant Senioravenue LLC policies and the applicable laws/regulations. They shall be aware of the Agencies Policies and Procedures and shall have a copy of the Standards of Conduct. All Independent Contractors shall sign Senioravenue LLC's Independent Contractor Agreement.

### **Orientation Performance Training**

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Training will be a pivotal aspect of running our organization. We are thrilled to be able to invest in our employees by providing a robust training plan.

Our plan will flow as follows:

### **Entry Level Training**

Employees will go through a non-paid orientation before being assigned to work with clients.

Two (2) hours of orientation training regarding his/her role as a caregiver and terms of employment.

Content reviewed during the orientation may include but not limited to:

- ***Company Vision***
- ***Review Job Description***
- ***Review/Acknowledge***
- ***Complete Job Application, Retrieve references and legal documents with CDSS***
- ***Initial Training with Care Academy online courses (sheet provided on how to access)***
- ***Employee Handbook: Senioravenue's Website (online e-document signature)***
- ***Client Confidentiality Agreement (online e-document signature)***
- ***HIPAA Agreement (online e-document signature)***

The basic health and safety training will be conducted by the **Care Academy** online training program. Doing the initial training with **Care Academy** courses is accessible through the **Axis Care** app provided during the orientation meeting.

### **Annual Training**

Our affiliated Home Care Aides must complete a minimum of five (5) hours of annual training related to core competencies and are also population specific. Proposed training must include but not limited to and subject to change the following topics:

***Preparing Meals to Meet Cultural, Ethnic, Religious and Dietary Needs***  
***Client's Rights, HIPAA and Elder Abuse Prevention***  
***Assistance with Independent Living Through IADLs***  
***Safety Precautions & Falls Prevention: Part 2***  
***Assisting with Personal Care through ADLs***  
***Addressing Agitation and Aggression in Dementia***

### **COMPLIANCE TRAINING**



Senioravenue LLC is always offering training about compliance procedures and policies, rules and regulations, and applicable laws. What's more, supervisors and managers shall advise every employee that:

Compliance with the policies and procedures is one employment condition; and Violation of the policies and procedures can result in Senioravenue LLC's Disciplinary Action Policy – up to and including employment termination.

Apart from the information relating to Senioravenue LLC's Compliance Program employees will receive on their orientation process, they shall also receive regular education and/or compliance reviews at least once in a year. Senioravenue LLC shall also offer subsequent training as they develop and implement new policies and procedures. Staff members should seek clarification and/or information from the Designee/compliance officer or their supervisor when need arises. The Designee/Compliance officer shall remain active in presenting revised or new compliance information to the staff members immediately after receiving such information.

The participation of employees in compliance training shall include the materials distributed and the training attendance and it shall be documented. The employees' attendance and participation in the training programs shall be one condition of continued employment. Failure to comply with requirements of the training may result in a disciplinary action, in conformity with Senioravenue LLC's Disciplinary Action Policy.

## **COMPETENCY**

1. The members of staff shall adhere to Homecare Senioravenue LLC standards and certifications levied by:

(a) California Department of Social Services

2. Senioravenue LLC shall also maintain its competency, training, qualification, evaluation and any related policy to ensure that competency standards are revised and met as indicated.

3. Senioravenue LLC shall reach to engage Personal Care Assistants to ensure that they are complying with California and/or State Certification during all job application processes.

4. Senioravenue LLC shall document the competency evaluations and retain the records in the Care Aide's personal file.

### **PERFORMANCE APPRAISALS**

Compliance with Standards of Conduct is an element in employee's Job performance assessment. Promotion of employee's adherence to the Standards of Conduct shall be an element in management and supervisory staff performances evaluation. The failure of the staff members to instruct the subordinates adequately or to detect compliance and the applicable legal requirements violation may lead to disciplinary action in conformity with Senioravenue LLC's Disciplinary Action Policy. That is if their sensible attentiveness could have alarmed them to violations of the kind.

### **NON-COMPLIANCE CONSEQUENCES**

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Every staff member of Senioravenue LLC shall:

- (a) Perform all their duties in a way that is consistent with policies of Senioravenue LLC; and
- (b) Report any violations of the local, state and/or federal laws or regulations to the Designee/Compliance Officer or their supervisor, as the law requires.

Any employee who fails to report a violation, and is aware that no one reported the violation, will have violated a legal obligation. He/she will be subject to disciplinary actions and that could lead to employment termination. Senioravenue LLC will also take a disciplinary action if an investigation has determined that a wrongdoing or misconduct has already taken place. That will also depend on the misdemeanor severity. The disciplinary action will involve four stages, which:

- (a) Verbal warning
- (b) Written warning
- (c) Work suspension and
- (d) Employment termination

Violations of compliance policies, Standards of Conduct and/or federal, state, and any other applicable local laws and regulations might lead to a disciplinary action in a manner that the Manager and/or the Supervisor will deem appropriate in an attempt to forbid similar misdemeanors from happening in the future. Every disciplinary action shall be applied fairly and in a consistent manner and the individual's position in Senioravenue LLC will not influence it.

The Designee/Compliance officer shall not have responsibility or authority for a disciplinary measure. His duty will be to investigate, evaluate and make recommendations that are consistent with the policies and procedures of Senioravenue LLC to the manager and/or supervisor. Only the manager, supervisor or the governing body shall enforce a disciplinary action, in conformity with Senioravenue LLC Home Care's Disciplinary Action policy.

## **CULTURAL COMPETENCY AND DIVERSITY**

## POLICY AND PLAN

I. CULTURAL COMPETENCY AND DIVERSITY PLAN Introduction: Cultural competency is an integral part of Senioravenue LLC. Employees of Senioravenue LLC who are in direct contact with persons served and their families, other employees will demonstrate the following:

- Recognize value, affirm and respect the worth of each individual they come in contact with, and protect and preserve the dignity of each.
- Utilize appropriate resources to ensure language needs of persons are met
- Assess resources that match the cultural and diversity needs of each individual
- Utilize culture-specific information provided in training and/or employee orientation to assist in identifying and determining the cause of culture-based issues and miscommunication and to resolve these issues Senioravenue LLC ensure non-discriminatory and respectful services to recipients, their families, other employees employing both internal and external cultural competency practices.

Senioravenue LLC as a homecare provider of services geared toward independence and choice for the persons we serve, accommodates, facilitates, treats, and assists persons of all cultures, ages, races, genders, sexual orientation, socio-economic status, languages, and ethnic backgrounds, spiritual and religious beliefs.

## II. INTERNAL CULTURAL COMPETENCY AND DIVERSITY PRACTICES

(1) Discrimination is not tolerated and employees will conduct services in a manner that recognizes values, affirms and respects the worth of the individuals and families we serve, other employees, and protect and preserve the dignity of each person.

Attached are Senioravenue's LLC policies in the Employee Handbook to support this philosophy: Equal Employment Opportunity, Policy against Sexual Harassment, Accommodating Employees with Disabilities.

(2) Senioravenue LLC provides training that is comprehensive, behaviorally and theoretically based cultural competency training and education is identified and offered.

(3) All employees have access to Senioravenue's LLC Cultural Competency and Diversity training courses on the Care Academy website mobile app.

**Professionalism:** This class explores the importance of communication skills for professional caregivers.

You will learn to recognize cultural differences and identify strategies for communicating effectively with those whose language and cultural background differ from yours.

Recognize cultural differences through behaviors or beliefs. Communicate effectively with those whose language background differs from yours.

With Care Academy this class helps caregivers recognize what cultural competency is and its role in health care. Caregivers will also learn about how assumptions and myths impact commonly marginalized groups.

They will learn how to identify discriminatory language, behavior, implicit bias, and micro aggressions.

They will also learn how to apply strategies to address possible personal biases. Objectives Define the meaning of cultural competency and its role in health care and the impact of assumptions and myths on marginalized groups Identify examples of discriminatory language, behavior, implicit bias, and micro aggressions recognize examples of indirect discrimination.

## **FALL PREVENTION POLICIES AND PROTOCOL/REPORTING**

## 1. Education and Training:

Train employees on fall prevention strategies specific to working with seniors.

This training should cover:

- ☐ Safe Transfer Techniques: Teach proper techniques for assisting seniors with transfers (e.g., getting in and out of bed, chairs, or wheelchairs). Training online in Care Academy or mobile app
- ☐ Communication Skills: Help employees communicate effectively with seniors to understand their needs and preferences.
- ☐ Use of Mobility Aids: Provide training on using mobility aids (e.g., walkers, canes) safely.
- ☐ May recommend Installing Grab Bars: Place grab bars near toilets, showers, and tubs.
- ☐ Encourage seniors to follow medication schedules.

## 2. Fall Reporting and Documentation:

- o Use the Incident reporting form document falls or near-miss incidents.

For additional resources, you can explore the CDC's Falls Interventions and their Community Prevention Guide.

These provide evidence-based information and practical guidance for fall prevention programs.

### 1. Incident Reporting Form Requirements:

- o Complete an incident reporting form that captures essential details. Include fields such as:

- ☐ Date and time of the incident
- ☐ Location (room, area, etc.)
- ☐ Description of the fall or near-miss event
- ☐ Contributing factors (e.g., slippery floor, poor lighting)
- ☐ Witness information (if any)
- ☐ Actions taken immediately after the incident

### 2. Reporting Process:

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- o Train staff members (including caregivers, and aides) on how to complete the incident report.

- o Establish clear guidelines for reporting:

- ☐ Timeliness: Reports should be submitted promptly after the incident.

- ☐ Accuracy: Encourage factual and objective descriptions.

- ☐ Confidentiality: Emphasize the importance of maintaining residents' privacy.

- ☐ Common Factors: Look for recurring causes (e.g., specific locations, activities).

- ☐ Staff Training: Provide additional training on safe transfer techniques and fall prevention.

### 3. Communication and Feedback:

- o Encourage open communication about safety concerns. Remember that a proactive approach to fall prevention is crucial.

- ☐ Training Program A comprehensive training program for all caregivers. Include safe transfer techniques, fall prevention strategies, and proper use of mobility aids.

- ☐ Training currently included with Care academy

- ☐ Communication: Encourage open communication among staff regarding fall prevention.

Regular team meetings can help share best practices and address concerns.

## **FRAUD, WASTE, AND ABUSE POLICY PURPOSE:**

☐ To help prevent and detect incidences of fraud, waste, and abuse in the provision of services funded by Healthcare Benefit Programs, including Medicaid, and private-pay clients.

☐ To outline the steps and procedures to be followed to ensure compliance with all applicable laws and regulations related to Healthcare Benefit Programs.

**Responsibility:**

It shall be the responsibility of Senioravenue's LLC Anti-Fraud, Waste, and Abuse Committee to establish, implement, maintain, and revise effective procedures to help Senioravenue LLC in preventing, detecting, and reporting potential/suspected or established cases of fraud, waste, and abuse.

The responsibility of preventing, detecting, and reporting potential/suspected or established cases of fraud, waste, and abuse extends to all individuals associated with Senioravenue LLC, including employees, contractors, volunteers, and clients/client representatives.

**Definitions:**

Senioravenue LLC defines and recognizes Fraud, Waste, and Abuse as:

**Fraud:**

Knowingly and willfully executing, or attempting to execute, a scheme or artifice to defraud any healthcare benefit program or to obtain (by means of false or fraudulent pretenses, representations, or promises) any of the money or property owned by, or under the custody or control of, any healthcare benefit program. 18 U.S. Code § 1347

**Waste:**

The overutilization of services or other practices that, directly or indirectly, result in unnecessary costs to the healthcare system, including the Medicare, and Medicaid programs. It is not generally considered to be caused by criminally negligent actions but by the misuse of resources.

**Abuse:**



Abuse is payment for items or services when there is no legal entitlement to that payment, and the individual or entity has not knowingly and/or intentionally misrepresented facts to obtain payment.

**Policy:**

At Senioravenue LLC, we are committed to preventing and detecting fraud, waste, and abuse in the provision of all services, including the ones funded by Healthcare Benefit Programs, such as Medi-Cal. We shall provide all our services ethically and submit appropriate claims while providing high-quality care.

In addition to that, we have established a couple of procedures to help prevent, detect, address, and resolve practices that do not conform to the expectations of our clients, Medicare, and other Healthcare Programs.

These procedures include:

- ☐ Designating a compliance committee
- ☐ Developing and implementing written standards for compliance and practice
- ☐ Providing appropriate training and ongoing education
- ☐ Carrying out regular internal monitoring and auditing activities
- ☐ Developing open lines of communication
- ☐ Responding promptly and appropriately to suspected and established cases of noncompliance
- ☐ Developing, publicizing, and enforcing disciplinary standards

**Procedure:**

SENIORAVENUE LLC  
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Phone: (510) 849-7009

## 1. Designating A Compliance Committee:

Senioravenue LLC has an Anti-Fraud, Waste, and Abuse Committee, composed of the following

parties:

☐ Agency owner

☐ Administrator

☐ Service Supervisor

☐ Individuals from different departments within the agency, including the administrative and care delivery departments.

Function:

The function of Senioravenue LLC Anti-Fraud, Waste, and Abuse Committee is to oversee and

deter Fraud, Waste, and Abuse within the agency.

Some of the activities that the committee shall undertake include:

☐ Establishing, implementing, maintaining, and revising effective procedures.

☐ Preventing, detecting, investigating, and resolving potential/suspected or established cases of fraud, waste, and abuse.

☐ Reporting potential/suspected or established cases of fraud, waste, and abuse.

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☐ Establishing, publicizing, and enforcing disciplinary standards.

#### Annual Meetings:

☐ The Anti-Fraud, Waste, and Abuse Committee shall meet annually, or sooner if need be, to monitor compliance by conducting an internal/ self-evaluation review.

☐ At a minimum, the self-evaluation/internal review shall consist of reviewing Senioravenue's LLC Anti-Fraud, Waste, and Abuse measures/ procedures and Members' billing records.

☐ At each sitting (at least annually), the Committee shall revise Senioravenue's LLC Anti-Fraud, Waste, and Abuse measures/ procedures if necessary to reflect changes in laws and regulations or agency requirements.

All changes made shall be immediately communicated, verbally and in writing, to all relevant staff members. Senioravenue's LLC billing procedures shall be updated if needed.

#### Billing Records Review:

The Committee shall monitor and review a 25% random sample or a minimum of 50 records

(both active and closed client records), whichever is less, to:

1. Assure that the agency has been adhering to all given rules and regulations and agency procedures in submitting claims for services rendered.
2. Determine the adequacy or appropriateness of Senioravenue's LLC procedures in relation to the prevention of Fraud, Waste, and Abuse.

The review shall include a plan and time frame to correct any deficiencies identified. The Administrator shall document the review and maintain it in the administrative files.

#### 3. Developing And Implementing Written Standards For Compliance And Practice:

Senioravenue's LLC, through our Anti-Fraud, Waste, And Abuse Committee, has developed and implemented written standards for compliance and practice. These

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standards are meant to help the agency prevent, detect, address, and resolve practices that do not conform to the expectations of our clients, Medicare, and other Healthcare Programs.

These standards/procedures include:

- Providing Appropriate Training and Ongoing Education:
- All employees and relevant stakeholders shall receive orientation and ongoing training/education on the compliance requirements of Medi-Cal and other relevant payers, and the expectations of Senioravenue. Proof of training shall be documented in their personnel files.

#### Carrying Out Regular Internal Monitoring and Auditing Activities

Senioravenue's Anti-Fraud, Waste, And Abuse Committee meets annually (or sooner if an issue related to fraud, waste, and abuse arises) to carry out internal monitoring and auditing activities.

#### Developing Open Lines of Communication/Reporting Mechanism

☐ The telephone number of the Administrator or designated Contact Person who can be called in case of a report, complaint, question, or clarification related to fraud, waste, and abuse shall be included in the client's home file.

☐ Before the commencement of service provision, all new members (or their representatives) shall be notified, verbally and in writing, of their right to complain or present any suspicions or concerns related to fraud, waste, and abuse to Senioravenue LLC or any outside source of their choice, including the Police, Medi-Cal, and other relevant payers.

☐ All new employees, contractors, and volunteers shall be notified of their obligation to complain or present any suspicions or concerns related to fraud, waste, and abuse to Senioravenue LLC or any outside source of their choice, including the Police, Medi-Cal, and other relevant payers.

☐ The telephone number of outside authorities where employees, volunteers, contractors, or members/clients can report any suspected cases shall be included in the home files of all members/clients, and in the Employee Handbook.

☐ Calling or sending a message to the OMBUDSMAN 1 800-231-4024

☐ Anonymous Reporting – Senioravenue LLC has established an anonymous reporting system where employees, contractors, volunteers, and clients can submit a report to Senioravenue LLC without having to reveal their identity. They shall be notified of this system during the client intake/employment processes and the system shall be induced in Senioravenue’s LLC Client and Employee Handbook.

The Anonymous Reporting System involves:

Calling or sending a message to the OMBUDSMAN 1 800-231-4024

☐ Non-Retaliation – Senioravenue LLC strictly prohibits retaliation against any employee, contractor, volunteer, or member/member representative who reports, internally or externally, in good faith a concern related to fraud, waste, or abuse. All employees, contractors, volunteers, or members/members’ representatives will be notified of this verbally and in writing.

4. Responding Promptly and Appropriately To Suspected And Established Cases Of Incompliance:

Upon receiving a report or establishing a potential fraud, waste, or abuse, Senioravenue’s Anti-Fraud, Waste, And Abuse Committee shall conduct a thorough investigation to determine the validity of the concern. If fraud, waste, or abuse is substantiated, the Committee shall take appropriate corrective action, which may include disciplinary action, reimbursement, and legal action as required by law.

5. Developing, Publicizing, And Enforcing Disciplinary Standards:

Senioravenue’s LLC Anti-Fraud, Waste, And Abuse Committee has developed, publicized, and enforced the following disciplinary actions or standards:

☐ Any employee, contractor, or volunteer of Senioravenue LLC who commits fraud, waste, or abuse as per the agency’s DEFINITIONS will be terminated and handed to the law enforcement authorities.

☐ Any client or client representative who is established to have committed fraud, waste, or abuse as per the agency’s DEFINITIONS shall have their services terminated.

☐ All clients, employees, contractors, and volunteers shall be informed, verbally and in writing, that committing fraud may result in jail time, probation, fines, and exclusion.

6. Reporting to the Authorities:

If fraud, waste, and abuse are identified, the Administrator, on behalf of the Anti- Fraud, Waste, And Abuse Committee, shall report the issue immediately to the appropriate office or authorities, as required by law, and cooperate with any investigations.

**7. Returning Overpayment:**

Any overpayment will be returned to the funding source.

## **CONCLUSION**

Senioravenue LLC shall take measures constantly as a way of ensuring that all its activities, actions, and those of its employees comply with the applicable laws and the various ethical standards. The main purpose of the Standards of Conduct is to offer direction to all employees as a way of enabling them to meet their duties. Employees shall comply with every applicable law, including those that are not in the Standards of Conduct. Employees should contact the Designee/Compliance Officer or their supervisor when a question or concern about their duties arises.

## RECEIPT AND ACKNOWLEDGEMENT

Each staff member of Senioravenue LLC shall receive a copy of Senioravenue LLC Employee Handbook. He/she should read and sign attesting to the fact that he/she is responsible for knowing and adhering to the handbook. Every staff member will keep a copy of the online document sign and another copy will be placed in his/her personal file. Every time revised or new Standards of Conduct are published, every employee must sign a statement to certify that he/she has received, read, and understood the handbook.

Signature:

Date:

Revised November/2024