

## Exhibit 15 Seniors Housing Liability Assessment Checklist (02/27/15)

This checklist indicates all topics to be addressed in a Seniors Housing Liability Assessment submitted to Freddie Mac in an underwriting package for a Seniors Housing Mortgage. See also Section 21.2(i) and Chapter 55 of the *Multifamily Seller/Service Guide* for additional requirements for a Seniors Housing Liability Assessment.

<b>The Seniors Housing Liability Assessment must address the following topics:</b>	
A	<b>Employee Practices</b> <ol style="list-style-type: none"> <li>1. Compliance with OSHA regulations</li> <li>2. Appropriate credentials and certifications</li> <li>3. Comprehensive in-service training for direct care staff</li> <li>4. Written complaint process</li> <li>5. Background checks, reference checks and exit interview</li> <li>6. Temporary staff and shift change procedure</li> <li>7. Staff to resident ratios per shift</li> <li>8. Peer reviews</li> </ol>
B	<b>Management Practices</b> <ol style="list-style-type: none"> <li>1. Objective periodic assessment of current risk management practices in the organization</li> <li>2. Whether written policies and procedures conform to actual practices</li> <li>3. Staff orientation, screening and discipline regarding resident care issues</li> </ol>
C	<b>Resident Practices</b> <ol style="list-style-type: none"> <li>1. Compliance with State and federal regulations</li> <li>2. Copies of written admission agreement and documentation of fees that identify scope of services to be provided</li> <li>3. Copies of resident assessments and qualifications of staff responsible for assessing residents prior to admission, as well as how often residents are assessed going forward</li> <li>4. Specific policies and procedures to address the following conditions:               <ol style="list-style-type: none"> <li>a. Resident service plan established and updated with changes in condition</li> <li>b. Resident evacuation in case of emergency</li> <li>c. Fall management</li> <li>d. Elopement/Wandering</li> <li>e. Skin Care</li> <li>f. Elder Abuse</li> <li>g. Dehydration/Malnutrition</li> <li>h. Neglect</li> <li>i. Mental health behavior plan</li> <li>j. Physical notification for change in resident condition</li> <li>k. Medication error</li> <li>l. Smoking</li> <li>m. Transfer/Discharge</li> </ol> </li> </ol>
D	<b>Reporting Requirements</b> <ol style="list-style-type: none"> <li>1. Claims management that meets all requirements set forth by insurance company</li> <li>2. Incident investigation procedures</li> <li>3. Name of insurance carrier or Third Party Administrator (TPA) handling claims management</li> </ol>