

# CODE OF CONDUCT



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## MISSION

*To be a premier provider and the facility of choice for long-term care residents and post-acute patients in every community we serve.*

## VALUES



### **Clinical Quality**

We provide our residents and patients with the necessary care and services to support their highest practical physical, mental, and social well-being.



### **Integrity**

We are dedicated to integrity in everything we do, to always act ethically, and to comply with applicable laws and regulations.



### **Service Excellence**

We provide excellent customer service and are a valuable partner to healthcare providers in the communities we serve.



### **Stewardship**

We use our financial and human resources responsibly to serve our residents, patients, and ownership.



### **Teamwork**

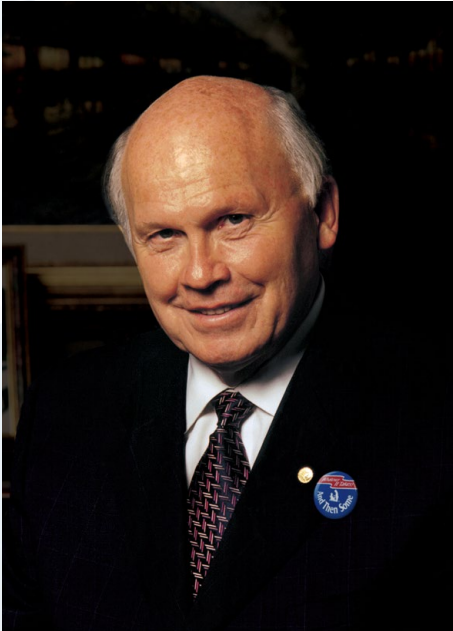
We work together to excel in everything we do and to treat each other with loyalty, respect, fairness, and dignity at all times.



### **Commitment**

We are committed to the Judeo-Christian ethic and the principle that obedience to God is best measured by service to others.

## MESSAGE FROM OUR FOUNDER AND CHAIRMAN



Dear Associate:

Those of us who work in healthcare quickly discover the joy and the blessings of serving others, particularly those who are vulnerable because of illness, post-acute care requirements, or the challenges of advancing age. In the process, an extraordinary bond of trust and appreciation develops between the caregiver and the recipient.

Our calling is a true ministry – serving God by serving others. And it demands the very best we have to offer, applying our professional talents in a spirit of love and compassion, and performing as an integral member of a highly functioning team.

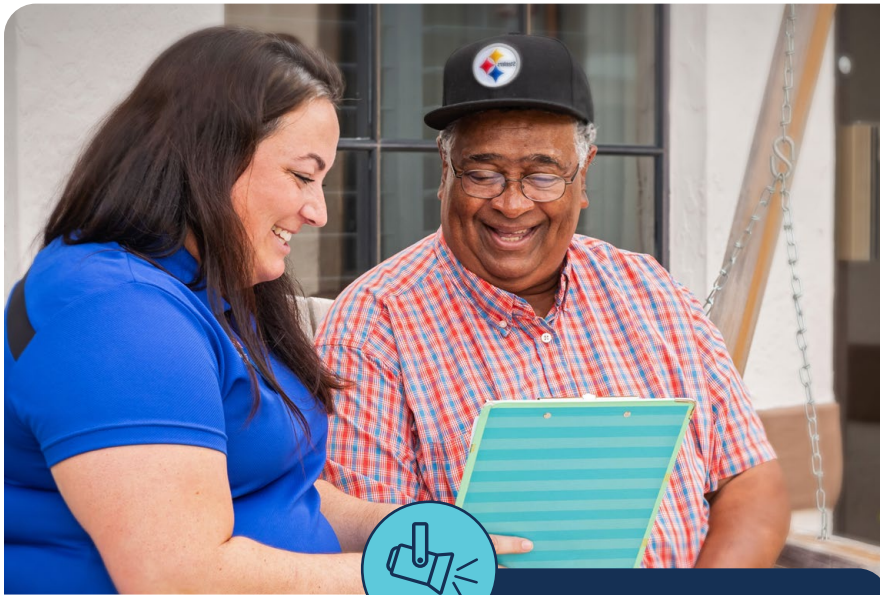
Our service must be founded on indisputable integrity – committing to doing the right thing, asking questions when necessary, speaking up when witnessing behavior that does not seem appropriate, and always acting in accordance with our Mission and Values, this Code of Conduct and other related standards. We cannot achieve the results that our residents and patients need and deserve without your dedication, ethical behavior, and hard work.

Thank you for your important role in building Life Care's reputation for service excellence one resident, one patient at a time.

A handwritten signature in blue ink that reads "Forrest L. Preston".

Forrest L. Preston  
*Founder & Chairman*





## Purpose of Our Code of Conduct

Our Code of Conduct (Code) is our pledge to serve those who depend on Life Care Centers of America. It is our promise to honor this commitment to integrity through quality care, service excellence, responsible stewardship, and respectful teamwork. The Code sets forth our expectations in following the ethical and legal standards that help us live up to our values and do what is right.

The Code is a critical part of our Compliance and Ethics Program. We have developed the Code to ensure that we comply with the applicable laws and regulations and do the right thing.

## How to Use Our Code

The Code is a resource to provide useful guidance for dealing with a difficult ethics or compliance situation. For easy access, it is available as a booklet and posted to the Company's intranet site.

## SPOTLIGHT Compliance Mandate

Compliance with the Code is non-negotiable and a condition of employment at, and doing business with, Life Care.

In some instances, the Code may fully answer questions related to a particular situation; however, it cannot provide answers to every question or situation you may encounter. In those instances, Life Care has other resources that can help, which are listed at the end of this document. Remember – Life Care counts on you to use good judgment and ask for help when needed.

In an unlikely event a waiver of a Code requirement seems necessary, it must be approved in writing by the Board or Chief Compliance Officer. If you need additional guidance from your supervisor or another Life

Care resource before making a decision, please utilize one of the resources listed on page 35.

## Who Must Follow Our Code?

Our Code applies to all Life Care associates, officers, members of its Board of Directors, and others when acting on behalf of the Company, such as vendors, contractors, medical directors, attending physicians, and healthcare professionals providing services to our residents and patients.

## What Are Our Responsibilities?

*Doing the right thing is a shared responsibility among all Life Care associates. To meet this commitment, we must:*

- **Always act with integrity.** Be professional, respectful, and ethical when acting on behalf of Life Care.
- **Know the standards and apply them.** This includes the Code, policies, procedures, applicable laws, regulations, and professional standards. Live by both the letter and the spirit of these standards every day. Never feel forced to violate our principles. If you ever feel such pressure or have any questions, consult with your supervisor or another Life Care resource.
- **Be familiar with the law, ask questions, and seek help when needed.** You do not have to be a legal expert, but you should be aware of the basic laws

and regulations that affect your specific job and level of responsibility. Ask questions, if needed.

- **Complete all required training.** Complete your assigned training on or before its due date. Ask questions if there is anything you do not understand.
- **Be an involved member of the Life Care team.** Offer suggestions on how to improve processes and on making policies and procedures easier to understand.
- **Cooperate with audits and investigations.** Be honest and truthful when responding to questions from auditors and investigators. Never destroy or alter records during, or in anticipation of, an audit or investigation.
- **Report concerns of actual or suspected misconduct.** If you know or suspect a violation of law, regulations, or policy has occurred, or if you are concerned about the ethics or compliance implications of a situation, talk to your supervisor or another Life Care resource. Never assume that management already knows or does not care about an issue. Always speak up if you have concerns.

- **Be instructive and lead by example.** Serve as a positive role model for compliant and ethical behavior. Ensure that new associates and others receive a copy of the Code and understand its requirements as well as those set out in our policies. Verify that they are trained and understand their responsibilities.

ask, pressure, or expect an associate or others to violate any laws, regulations, the Code, or Life Care policies.

- **Do not retaliate or tolerate it from others.** Anyone who makes a good faith report of a suspected violation of law or policy or who cooperates with an audit or investigation must not suffer retaliation for doing so.



## WHAT IT MEANS

### Good Faith Reporting

Reporting in good faith means the person raising the issue believes that he or she is providing complete and truthful information about the matter. Reporting in good faith does not include filing a report with reckless disregard for or willful ignorance of facts that would disprove the report.

## What Are Additional Leadership Responsibilities?

*We rely on our leaders to promote an environment that supports our core values and compliance with the Code. Consequently, Life Care leaders have these additional responsibilities:*

- **Be receptive.** Maintain a work environment that demonstrates you are open and available to address questions or concerns about compliance and ethics-related issues.
- **Be responsive.** Report any known or suspected misconduct when you are notified about it. If someone tells you about potential misconduct, take prompt and appropriate action. If you are unsure what to do, seek assistance from your supervisor, senior leadership, or from other Company resources such as Legal and Risk Services or the Compliance department.
- **Do not ask others to do what is prohibited.** Never

## Raising Questions and Reporting Concerns

Violations of laws, regulations, the Code, and other applicable standards can cause legal and financial liability for Life Care and you, or result in harm to our residents, patients, and reputation. Consequently, you must report any actual or suspected ethics or compliance concern that comes to your attention. Anyone found responsible for such misconduct will be disciplined according to the nature of the violation, up to and including, termination of employment and, in some cases, may be subject to legal penalties and prosecution.

If you see or suspect any violations, or have a question about what to do regarding a particular situation, promptly talk to your supervisor or another available Life Care resource (see Life Care Resources list on page 35 and find policies and procedures on Village Square, Life Care's intranet). When all associates fulfill this requirement to raise concerns in a timely way, we demonstrate our commitment to moral, ethical, and legal conduct.

## Non-Retaliation

Life Care prohibits retaliation against anyone for raising, in good faith, a legal, ethical, or safety concern or cooperating with an investigation. Retaliation can also be against the law, leading to potential civil liability or criminal penalties. Consequently, Life Care is committed to protecting you from retaliation. If retaliation occurs, it will result in discipline up to and including termination

of employment for the responsible party. If you experience what you feel is retaliation for reporting or assisting in the investigation of a good faith report, promptly notify the Compliance department so it can be addressed.

## Investigations and Confidentiality

- **Confidentiality.** Information shared with any resource or reporting channel will be treated confidentially to the extent allowed by law and shared only on a need-to-know basis (e.g., with the investigator) to address the issue. To protect the integrity of the investigation, those interviewed should strongly consider not sharing information about the investigation (e.g., the questions asked).
- **Investigations.** When an investigation is necessary, it will be conducted by the

Compliance department, the Human Resources department, or other appropriate internal or external resources. Some types of misconduct must be reported by law to external authorities. To adequately review an allegation, investigations can sometimes be lengthy for complex situations.

- **Your responsibility.** If you are asked to participate in an internal investigation or audit, you must cooperate and be forthcoming and truthful. Never alter or destroy records in anticipation of, or response to, an investigation or audit.

Sometimes Legal and Risk Services will issue a "hold" on internal documents. Additionally, records that are related, yet not part of the hold, must also be preserved until the conclusion of the query.



## SPOTLIGHT

### Examples of General Workplace Issues

- Harassment
- Bullying
- Discrimination
- Suspected use of alcohol, illegal drugs, or other mind-altering substances in the workplace, including misuse of prescription drugs
- Disagreements between you and a coworker
- Wage, hour, and schedule issues

### Examples of Compliance and Ethics Issues

- Inaccurate coding or billing
- Misappropriation of resident or Company funds or property
- Drug diversion
- Unauthorized disclosure of protected health information (e.g., a HIPAA violation)
- False or inaccurate claims submitted to Medicare, Medicaid, or other payors
- Other suspected violations of law, regulations, the Code, policies, or procedures





### Where to find more

- Compliance and Ethics Liaison Policy
- Compliance Reporting and Investigation Policy
- Disclosure Program Policy
- Non-Retaliation Policy
- Leaders Guide to Our Compliance and Ethics Program

### Making the Right Choice

Making good, ethical decisions is not always easy or clear. Legal standards and care situations can be complex. When you are faced with a tough ethical decision, it may help to ask the following questions.

- **Does my action uphold Life Care's standards?**
- **Does my action align with the spirit of the Code?**
- **Would I be comfortable if my action was reported by the media?**
- **Am I sure my action is the right thing to do?**

If you answered "Yes" to **all** these questions, proceed with your action!

If you answered "No" to **any** of these questions, discuss with your supervisor or another Life Care resource before acting.

## Quality Care

### Our Commitment

We provide our residents and patients with the care and services necessary to experience the highest physical, mental, and psychosocial well-being they individually can achieve. Our teamwork and dedication to this principle creates the highest quality of care.

### What to Know

Great quality care has many components, including focused effort to:

- Provide quality services to all persons who require them without regard to race, color, national origin, sex, gender identity, sexual

orientation, age, or disability;

- Treat all residents, patients, and their families with respect and dignity at all times;
- Ensure appropriate and qualified staffing;
- Protect resident and patient privacy and maintain appropriate records;
- Ensure appropriate care is tailored to meet the residents' and patients' clinical needs;
- Educate residents, patients, and/or their families concerning care provided, and involve them in all details or aspects of their care; and
- Ensure resident and patient safety.



### Where to find more

- Clinical Services Manual
- Abuse and Neglect Policy
- Abuse – Reporting and Response – Suspicion of a Crime Policy
- Elder Justice Act Fact Sheet

### What to Do

- **Know the standards.** Read and thoroughly understand the policies and standards that relate to your role or level of caregiving. Complete related training on how to deliver the care and use equipment and supplies in your role. Seek

## HOW TO LIVE IT

Q

One of our residents fell prior to coming to our facility. She often gets up and wanders during the night. I worry that she will fall and hurt herself. How can I help her?

*This is a safety concern and should be reported to the charge nurse so the interdisciplinary team can put appropriate interventions in place and care plan for this resident. As part of this process, the reason for the wandering should be addressed. It is important to get the interdisciplinary team, physician, and family involved to determine the appropriate plan of care.*

A

Q

Why do we need to use two resident or patient identifiers when providing care and services?

*Misidentifying a resident or patient is a safety issue. When care is being provided, associates must be able to identify the resident or patient for whom the services or treatment is intended and be able to match it to that individual. For example, the facility must have two resident or patient identifiers when collecting blood samples and specimens, providing treatment, and administering medications.*

A

Q

Our policies and procedures as well as the training I received requires me to get another associate to use a lift when required per the care plan. I have been using a lift for many years and many times I believe I can use a lift unassisted. If another associate is busy with another patient, can I use a lift alone?

*No. When required, you must always obtain assistance to ensure the safety of our residents as well as our associates.*

A



# SPOTLIGHT

## Elder Justice Act

Everyone who works for or on behalf of Life Care is required by law to report any reasonable suspicion of a crime committed against any person who is a resident or patient of, or is receiving care from, a Life Care facility. The report must be made to specific law enforcement agencies and to the applicable state survey agency. Timing is critical. Make the report within 2 hours of forming a reasonable suspicion that a crime has occurred if there is a serious bodily injury. Report within 24 hours of forming a reasonable suspicion if there is no serious bodily injury. Refer to the Abuse - Reporting and Response - Suspicion of a Crime Policy or talk to your supervisor if you have any questions.

help from your supervisor to understand anything that is not clear.

- **Be vigilant.** Recognize and report those practices and situations that could be improved to prevent lapses in care quality or patient safety.
- **Speak up.** Immediately report issues related to quality care or resident or patient safety that could be or have been jeopardized. Bring your concerns to the attention of your supervisor or another Life Care resource. This is critical and a condition of employment.

## Resident and Patient Rights

### Our Commitment

We are devoted to the preservation of dignity, self-respect, and resident and patient rights in a loving and caring environment. Our residents and patients have, among other rights, the right to a dignified existence, self-determination, and communication with and access to people and services both inside and outside the facility. We are committed to ensuring that each resident and patient is aware of his or her rights.



### Where to find more

- Clinical Services Manual
- Resident Rights Policy
- Credentialing and Privileging of Licensed Practitioners Policy
- Background Screening Policy for Associates
- Background Screening Policy for Non-associates
- Non-Discrimination Regarding Language Assistance Services Policy
- Lesbian, Gay, Bisexual, Transgender, and Questioning (LGBTBQ+) in LTC Policy
- Omnicare LTC Facility Pharmacy Services and Procedure Manual
- PharmMerica Nursing Care Center Pharmacy Manual

### What to Know

- Life Care does not tolerate any type of abuse or neglect.
- We will not deny access to care based on any personal characteristic protected by law or our policies.
- Anyone who abuses or neglects a resident or patient will be reported to the appropriate state agencies. They may also be the subject of legal and/or criminal actions, and will be subject to dismissal if they are an associate or working on Life Care's behalf.
- Life Care conducts pre-hire background checks that include checking criminal histories, abuse registries, sex offender registries, and other databases to ensure that our residents, patients, and others are protected from harm.

### What to Do

- **Treat residents and patients with dignity and respect.** A resident or patient with behavioral issues or an unusually busy shift are not reasons to treat a resident or patient poorly. You must treat all residents and patients as you would treat your own beloved family member.
- **Communicate appropriately.** Communicate with residents and patients in a way they can understand. Engage interpreters and use equipment to address communication challenges when needed. Encourage questions and seek help when you encounter language or other communication barriers.

# HOW TO LIVE IT

**Q** | We have a resident whose daughter makes all the decisions for her father. He is alert and capable of being involved, but every time he tries to voice his opinion, she shouts at him to keep quiet. Should I say something to someone?

*Yes. This is an example of verbal/mental abuse by the daughter. You must report this immediately to your supervisor, Director of Nursing, or Executive Director who will ensure that the situation is handled appropriately.*

| A

**Q** | I work in the Environmental Services department. I love my job, but I sometimes forget to knock on the door to a resident's room and ask permission to enter. It's my job to deliver their clean laundry. I'm always polite, and no one ever complains when I go into their room. I think it's a silly rule to knock and ask permission to enter. Is it OK for me to just deliver the clothes without doing this?

*No. Requiring staff to knock on doors and ask permission to enter is not a "silly rule" – it is a federal regulation. All residents and patients have rights guaranteed to them under federal and state laws and regulations. Each resident and patient have the right to be treated with respect and dignity and that includes respecting their privacy. All associates are responsible for the preservation of residents' and patients' rights.*

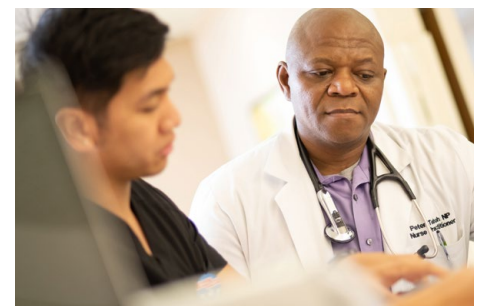
| A



## SPOTLIGHT Where to Report Abuse and Neglect

Per federal regulations, a facility must ensure that all alleged violations involving abuse, neglect, exploitation, or mistreatment, including injuries of unknown source and misappropriation of resident property, are reported to the State Survey Agency and other officials such as Adult Protective Services and law enforcement, when applicable. Reporting must occur no later than 2 hours after the allegation is made.

- **Invite involvement.** Help residents and patients understand their rights and get them involved in determining appropriate aspects of their care.
- **Protect residents and patients.** Ensure that residents and patients are protected to the extent possible. Prevent and refrain from physical, mental, sexual, or verbal abuse as well as neglect, misappropriation (theft), and exploitation. These may come from not only fellow associates, but also from other residents, patients, volunteers, agency staff, family members, visitors, legal guardians, friends, or other persons. If you are involved in the hiring process, ensure that all associates and others are properly screened for prior criminal offenses. If you are



involved in the credentialing process, ensure that Life Care's credentialing process is followed for physicians and physician extenders who treat our residents and patients.

- **Speak up.** If you become aware of or suspect abuse, misappropriation (theft), or exploitation related to a resident or patient, or other issue involving dangers regarding resident safety or care, you must report it immediately to your supervisor or another supervisor in your chain of command.

# HOW TO LIVE IT

**Q** I am a CNA, and yesterday I ran into Mrs. Miller while I was out shopping. She regularly visits some of our residents who are her church friends. During our chat, Mrs. Miller said she had recently returned from a trip and wondered how her friend, Mr. Jones, is doing. Mr. Jones is one of the residents I regularly care for. I did not tell her much, only that he was still a resident, and his condition has not changed recently. Did I tell her too much?

*Probably not. Mrs. Miller is not a member of Mr. Jones' family and probably not involved in his care; however, it is acceptable to acknowledge to anyone who asks about him that he is a resident/patient at our facility as long as Mr. Jones has not told us that we cannot do it. A better response would have been to thank her about her concern for our residents and patients, but politely tell her that you are not allowed to give out information about facility residents and patients without their authorization.*

A

**Q** During our lunch break at work, one of my coworkers started talking about a newly admitted resident who was a volunteer at the facility. She said he had severe osteoporosis, several fractures, depression, and is on a certain antidepressant. Is this a privacy violation?

*Maybe. If the information she shared was relevant to the resident's current treatment and it involved you assisting him or her to get out of bed, then it would be appropriate use of PHI. However, if this was casual conversation over lunch and you did not have a need to know this information, then it would be a violation of our privacy policies.*

A

## Safeguarding the Privacy of Our Residents and Patients

### Our Commitment

During the course of caring for our residents and patients, we gather a great deal of their personal information. It is our duty and legal obligation to safeguard their Protected Health Information (PHI) by preventing unauthorized or inappropriate access, use, and disclosure. We are committed to following all laws, rules, and regulations related to resident and patient privacy, so we only access and use PHI needed to do our jobs or when required by law or regulation. We can only disclose PHI with proper authorization.

### What to Know

Life Care has developed policies and procedures to help you ensure that all PHI is safeguarded.

PHI includes information such as:

- Demographics (e.g., name, birthdate, phone number, email address, geographic identifier, gender)
- Medical record number
- Social Security Number
- Insurance ID number
- Diagnoses
- Medical test results
- Medications
- Payment information

### What to Do

- **Minimize communication with others about PHI.** Avoid conversations or electronic communication with associates about PHI, unless they have a

work-related "need to know."

Do not talk to anyone outside Life Care about PHI unless they are authorized to know.

- **Do not mention PHI on social media.** Never post information or photographs that could be linked to a resident or patient on social media, social networking sites, or blogs without their authorization and your supervisor's approval.
- **Maintain resident and patient privacy.** Follow our policies and procedures. Never access, use, discuss, or share PHI except when necessary for treatment, payment, or healthcare operations. Ensure you have authorizations for any disclosures when required.



# WHAT IT MEANS

## Protected Health Information

Protected Health Information (PHI) includes medical, financial, and personal information that can be used to identify an individual. This includes all such information exchanged verbally or maintained in written or electronic form. The Health Insurance Portability and Accountability Act (HIPAA) of 1996 and its related regulations guide us in how we may use and share this information appropriately.

### ■ Access only the PHI you need.

For example, if you only need a resident's or patient's insurance ID number to complete a task, do not access the entire medical record.

## Gifts, Entertainment, and Other Business Courtesies

### Our Commitment

A modest gift of thanks or an inexpensive business dinner with a supplier may be acceptable. However, these can look like conflicts of interest or be an illegal kickback if offered in exchange for a referral or special favors.

We avoid real or perceived conflicts related to gifts, entertainment, or other business courtesies, which occur especially if the gesture happens frequently, or the value is large enough to cause someone to think it is influencing a business decision. Further, we never offer or accept such courtesies if the intent is to influence objective business decision-making or in exchange for any patient referrals to or from a Life Care facility or the purchase of supplies or equipment reimbursement by federal healthcare programs such as Medicare or Medicaid.

### What to Know

#### ■ Residents, Patients, and their Families.

Those in your care or their families may offer you gifts, gratuities, or tips as an expression of gratitude. Accepting such a courtesy may give the impression that you are providing special care to, or somehow favoring, a particular resident or patient. Also, it may be perceived that you are inducing the individual to stay longer at our facility or causing them to accept medically unnecessary services.

#### ■ Outside Business Partners.

Business courtesies can cause conflicts when they involve current and potential business partners and other individuals or entities outside of Life Care. Giving or accepting these courtesies can be seen as an attempt to improperly influence the relationship. When outside entities offer you materials, money, or other resources for educational purposes, you must obtain approval from Legal and Risk Services or the Chief Compliance Officer before accepting.



### Where to find more

- Health Information Management Manual
- Social Media Policy

#### ■ Government Representatives.

When government personnel or contractors are involved, strict guidelines prohibit any type of gratuity or payment for their meals, travel, or lodging expenses. They must pay their fair share whenever participating in joint work with Life Care (e.g., they buy their own meal if a meeting runs into lunchtime).



Government workers should know these regulations and automatically decline any courtesy that is improper for them to accept. If you give anything of value to a government official, it could be a legal violation even if there is no intent to influence the official's action or decision. This means you cannot entertain an official, or engage in other activities favorable to influencing them, without first obtaining authorization from Legal and Risk Services or the Compliance department (also see section entitled "Political Activities").

## What to Do

### ■ Never solicit or accept gifts and courtesies from those in our care or their families.

However, incidental gifts (e.g., perishables such as food) that can be shared with other associates may be accepted at the discretion of facility management.

### ■ Never solicit items of value.

You cannot request any tangible or intangible item of value, even a favor, from any person or entity outside of Life Care (e.g., vendors).

### ■ Do not give or accept cash or cash equivalents.

This includes tips, gratuities, and gift cards, including those for particular stores or food establishments.

### ■ You may offer or accept some courtesies involving business partners.

Modest gifts of perishables or consumables, as well as gifts, entertainment, and other business courtesies of nominal value (\$50 or less), may be

accepted if they are infrequent (no more than three times per year) and shared with coworkers, if practical.

### ■ Uphold the policies.

Comply with policies of the recipient's organization and our own when offering any business courtesy.

### ■ When courtesies involve government workers, follow our policies.

You must also uphold any state or local regulations that pertain to business courtesies. It is important to get authorization from Legal and Risk Services or the Compliance department before entertaining a public official or engaging in unauthorized lobbying efforts. (see section entitled "Political Activities").

### ■ Refuse inappropriate courtesies.

This may be uncomfortable for you or offensive to the giver, but when a courtesy is improper, you must politely decline it.

### ■ Ask for guidance when you are unsure.

If you encounter a situation involving a gift, entertainment, or other business courtesy, consult with your supervisor or another Life Care resource such as Legal and Risk Services or the Compliance department.



## Where to find more

- Gift and Entertainment Policy
- Free Transportation Services Policy
- Non-monetary Compensation Policy

## IF I AM OFFERED...



A gift card for \$20 to a coffee shop



A box of homemade cookies from a resident's family



\$10 cash tip from a discharging patient



A few notepads and pens with a supplier's logo



A patient offers a free mowing service from her husband's landscape company.

## MAY I ACCEPT?



*No. Gifts of cash or cash equivalents, such as gift cards, cannot be accepted.*



*Yes. A gift of cookies can be accepted if you share with your coworkers.*



*No. Even though the tip is nominal in value, cash gifts are not permitted.*



*Yes. A few inexpensive promotional items may be occasionally accepted.*



*No. This could appear to be an inducement for special favors or care.*

## Diversity, Non-Discrimination, and Harassment-Free Workplace

### Our Commitment

Life Care brings together a workforce with various skills, perspectives, experiences, and other personal characteristics. Diversity of talent helps create strong teams that consistently deliver the best quality care. We respect coworkers, job applicants, and business partners, judging them only on their qualifications, skills, and achievements.

### What to Know

- Each of us is responsible for respecting, accepting, and valuing individual differences among fellow team members, and for treating them in the way they deserve to be treated.
- Unlawful harassment, discrimination, and other unwelcome conduct is prohibited based on race, color, religion, sex (including pregnancy, gender identity, and sexual orientation),



## WHAT IT MEANS

### Unlawful Harassment

*Unlawful harassment includes, but is not limited to:*

- Slurs or epithets;
- Verbal or non-verbal threats;
- Derogatory comments in verbal, written or electronic form; or
- Verbal or physical conduct of a sexual nature that creates an intimidating, hostile, or offensive working environment.

national origin, age (40 or older), disability, genetic information, veteran status, or any other characteristic protected under federal, state, or local laws.

- Disruptive behavior that creates an intimidating or hostile workplace is not permitted.

### What to Do

- **Act with respect.** Treat others professionally and with respect at all times. Be aware of how others perceive your conduct. Comments, jokes, emails, texts, pictures, and other materials that seem appropriate to you may be

offensive to others in the workplace.

- **Avoid inappropriate bias.** Do not discriminate against others based on any characteristic protected by law or Life Care policy.
- **Support diversity.** Be inclusive of others and help them feel like a valued member of the team.



### Where to find more

- Associate Handbook for Field Associates
- Associate Handbook for Corporate Associates
- Respect Training

## HOW TO LIVE IT

**Q** | I told a joke at work about my own ethnicity. No one listening was from the same ethnic group and everyone laughed after I told the joke. However, HR later contacted me and said that someone complained about my joke. I did not mean to offend anyone, so how could this happen?

*You never know who might be offended by a joke, even if all listeners seemed to enjoy it and do not appear to share the characteristic in the joke. You may think it is funny, but someone in the audience may have had a friend or family member of that ethnicity, or maybe they simply do not like derogatory comments about any culture. Also remember, your intent does not matter – just how it is perceived.*

| A





# WHAT IT MEANS

## Personally Identifiable Information

Personally Identifiable Information (PII) is any data that could potentially be used to identify a particular person. PII includes many types of data, such as name, social security number, driver's license number, financial accounts, email addresses, physical addresses, phone numbers, and birth date. Many types of PII are similar to PHI (e.g., address, birthdate), but PHI is the term used in a healthcare context and includes medical information.

## Personal Privacy

### Our Commitment

Many of us have access to the personal information of our coworkers, business partners, and others outside of Life Care as part of our jobs. Personal confidential information can be used to commit identity theft and to harm individuals. We are dedicated to protecting this information, accessing, using, and disclosing it only when necessary to do our jobs.

### What to Know

- We protect the privacy of our coworkers' and business partners' personal confidential information with the same level of diligence that we protect that of our residents and patients.
- Only a few associates will need to access, use, or share coworker or business partner personal information for work purposes. However, if you should encounter such information in the workplace, you must know what to do to protect it.

### What to Do

- **Understand the types of protected personal information.** Many types of personal information are protected by law and our

policies (e.g., PII including Social Security Numbers, bank accounts, and credit card numbers).

- **Protect the personal confidential information of others.** This includes information about current and former associates, job applicants, physicians, contractors, and other business partners. Ensure this information is secured with limited access and transmitted electronically according to our policies.
- **Do not share personal information outside the Company.** The only exception is if your job involves handling the personal information of associates such as Human Resources, Accounts Payable, Benefits staff, or certain business partners who need access. Seek advice from Legal and Risk Services if a regulatory body, law enforcement, or anyone else requests associate information.
- **Access or discuss personal confidential information only with a legitimate business purpose.** Business

conversations involving this information must be conducted in a place where they cannot be overheard. Laptops and other computer equipment should be used securely to avoid exposing the information.

- **Destroy personal information that is no longer needed.** Follow our record retention policies and direction from Legal and Risk Services when such information is no longer required for business purposes or subject to a legal hold.
- **Promptly report loss or unintentional disclosure.** Immediately bring the issue to your manager or another Life Care resource because time is critical to addressing the problem.



### Where to find more

- Computer Security Guide
- IT Policy Manual
- Confidentiality of Life Care Information Policy
- Document Management Policy - Facilities

## Safety, Health, and Environment

### Our Commitment

We provide a safe and healthy work environment for associates and visitors to our facilities. Each of us is responsible for acting in a way that protects the health and safety of our fellow associates, our residents and patients, and others in the workplace. We also have a responsibility to protect and preserve the natural environment.

### What to Know

- In the course of daily operations, hazardous and infectious materials and waste are often used or generated. Life Care is responsible for the proper handling and disposal of these materials to protect the environment.
- Life Care has a zero-tolerance policy against threats or acts of physical violence. This includes abusive or aggressive behavior intended to threaten or intimidate another person in our workplace or at any off-site work-related activity. Do not tolerate physical violence or threats of harm.

- No firearms or weapons will be allowed on Company property at any time, except for those carried by law enforcement officers.



### What to Do

- **Uphold the standards.** Follow all Company health and safety standards, including those related to the handling, storage, and use of hazardous materials, other pollutants, and waste.
- **Ensure the Company complies with its permits, as required.** These allow Life Care to safely discharge hazardous materials into the air, sewage systems, water pollution control facilities, or onto land.
- **Engage qualified disposal services.** Hire only reputable, licensed vendors to transport and dispose of hazardous

materials, pollutants, and infectious wastes.

- **Do not conceal improper dumping.** No one at Life Care may conceal improper discharge or disposal of hazardous materials, pollutants, or infectious wastes.
- **Accurately maintain all records.** Permits, approvals, records, and controls must be maintained as required by environmental laws and regulations until such documents are destroyed with permission of Legal and Risk Services, or in accordance with our record retention policy.
- **Manage physical safety.** Uphold security standards by following facility entry and ID protocols, such as badging in without allowing others to “tailgate” through. Ensure safety by keeping work areas, hallways, and resident rooms free from obstacles, unsecured wires, and other potential hazards.
- **Promptly report any concerns.** Notify your supervisor or another Life

## HOW TO LIVE IT

Q

During a late shift, I noticed a puddle of colored liquid on the floor. I asked my coworker what it was, but she didn't know. I used paper towels to wipe it up and threw them in the trash. This seemed OK, but should I have done something else?

Yes. You should have reported the issue immediately to your supervisor or whomever was in charge of the shift. If the liquid was hazardous and thrown in the regular trash, it could be harmful to others. If you wore gloves to do the cleanup, you were likely protected, but maybe not adequately if the fluid was infectious or hazardous. After the wipe up, the floor may have required special cleaning.

A

# HOW TO LIVE IT

Q

I have seen a coworker using illegal drugs when she is not at work. It does not seem to affect her at work, except sometimes she is late to work after using. I believe the drugs are the cause, but should I tell our supervisor?

Yes, you should tell your supervisor if you know or suspect your coworker has a substance abuse problem. He or she will be able to address the tardiness, whatever the cause. The bigger issue that must be addressed is your coworker's possible abuse of illegal drugs that could eventually result in harm to a resident or patient, another associate, herself, or someone else. Your supervisor may also involve Human Resources or others for follow up.

A

Care resource about any unsafe equipment, violence, or other situation that could threaten human health or safety or damage the outside environment.

- **Keep the workplace safe and healthy.** Every associate plays a part in maintaining a safe and healthy workplace by preventing, watching for, and reporting unsafe practices or work conditions.

to work free from the influence of alcohol, mild-altering substances, and illegal or misused drugs.

## What to Know

- All associates must be free from the influence of alcohol, mind-altering substances, illegal drugs, and misuse of prescription drugs while on facility property or while performing job duties on behalf of Life Care.
- Distributing or possessing alcohol, mind-altering substances (e.g., marijuana), illegal drugs, or legal controlled substances that are improperly obtained at work or while on duty is prohibited.
- Off-the-job manufacturing, distribution, dispensing, or possession of illegal or unauthorized substances is not permitted.
- Off-the-job substance use is prohibited if it affects work performance, (e.g., absenteeism, tardiness, or poor job performance).

## What to Do

- **Never come to work impaired by substances.** You cannot perform your work duties properly and safely under the influence of alcohol, mild-altering substances, illegal drugs, or controlled substances that are improperly obtained or misused.
- **Report any use or presence of prohibited substances at work.** This can prevent accidents and injuries before they happen.
- **Fulfill your extra responsibilities if controlled substances are part of your job.** Ensure they are securely stored and accounted for according to policy. Immediately report any missing or diverted drugs.
- **Report alcohol, drug, or substance convictions.** If you are convicted of a alcohol, drug or substance use violation (e.g., illegal possession, driving under the influence), you must notify your supervisor immediately.



## Where to find more

- Omnicare Manual
- Infection Prevention and Control Manual
- Environment of Care Manual
- Wound Care Resource Manual

## Use of alcohol, mind-altering substances, and drugs

### Our Commitment

Life Care is committed to providing a safe environment and the highest level of service, while minimizing the risk of accidents and injuries. This can only be achieved by associates who come

## Billing for Services

### Our Commitment

We will comply with all payor rules and prepare accurate, properly coded billing statements that reflect only medically necessary and billable services provided and documented in the medical record.

### What to Know

- The federal False Claims Act (31 U.S.C. § 3729) prohibits us from knowingly submitting false claims to or withholding money due to federal healthcare programs. Many states also have similar laws. Our policies prohibit us from knowingly sending inaccurate or false claims to any of our payors.
- Knowingly means actual knowledge or acting in reckless disregard or in



# WHAT IT MEANS

## False Claims

### False claims could include:

- A service or item that was not provided, not medically necessary, or billed more than once
- A non-covered service billed as a covered service
- Services billed separately that are covered in the room rate
- Inadequate or substandard care
- Use of inaccurate coding (“upcoding”) or patient status to increase reimbursement
- Failing to promptly identify and refund overpayments
- Submitting bills that are not supported by clinical documentation

deliberate ignorance of the truth or falsity of the information.

- An innocent misunderstanding, careless mistake, or error related to billing has potentially serious consequences. It could lead to allegations of fraudulent billing practices,

which could expose Life Care and its associates to legal liability.

### What to Do

- **Properly document care and treatment information.** Resident and patient records must be accurate, timely, and complete.

## HOW TO LIVE IT

**Q** | The physician for one of our Medicare Part A residents is out of town, so I have not been able to get his signature on the Physician Recertification that is due. We are supposed to submit our Medicare bills today. Can I submit the bill and get him to sign the Recertification later when he returns?

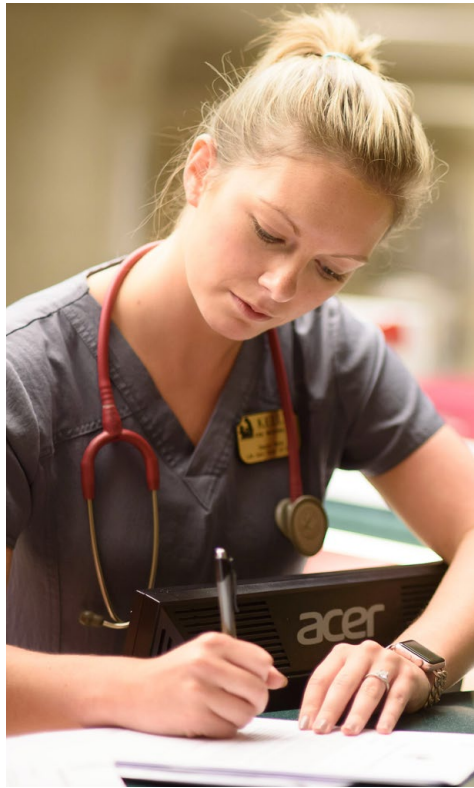
*No. A valid Physician Certification/Recertification for Medicare services is a condition of payment under federal regulations. Consequently, we cannot submit a Medicare Part A claim without a required Recertification if one is due. When the physician returns, you should complete a Delayed Recertification that includes an explanation of why it is late (“Physician was out of town when Recertification was due”), then have the physician sign and date it. You may then bill the claim.*

| A

**Q** | I am not involved in the billing process, so how does this billing standard apply to me?

*If you are not directly involved in billing, you may help ensure regulatory compliance and ethical practices in the billing process by providing accurate, timely, and complete documentation of the services that you provide.*

| A



- **Follow proper coding procedures.** Assign billing, diagnoses, and other codes accurately based on the information in the medical record.
- **Create accurate bills.** Only bill for items and services provided based on the care documented in the medical record.
- **Review bills thoroughly prior to submitting a claim.** Follow Life Care’s policies and procedures for checking claims against supporting documentation to ensure any errors identified are corrected prior to billing.
- **Promptly research and resolve credit balances.** If a resident or patient account has a credit (i.e., a negative) balance, promptly review it to determine if it was caused by a payor or individual that overpaid the amount due. If

this is the case, refund any overpayments as soon as practical. Any refund must be made within timeframes set by federal and state laws.

- **Raise any billing concerns.** If you become aware of or suspect any inaccuracy or other issue in the coding and billing process, including overpayments, immediately raise the issue to your supervisor or another Life Care resource.



### Where to find more

- Medicare Claim Triple Check Policy
- Reporting and Returning Overpayments Policy
- Credit Balance and Refund Policy
- Rehab Services Manual 2.1 Billable Services Policy

## Conflicts of Interest and Loyalty

### Our Commitment

To best serve those in our care, we maintain appropriate relationships with third parties, including residents and patients and their families, health care practitioners, suppliers, vendors, contractors, and competitors so no third-party has, or appears to have, an opportunity to inappropriately influence Life Care’s decisions or activities or patient care.

### What to Know

- A conflict can occur in many personal and business situations.
- Business opportunity. If you learn about an opportunity due to your job that would benefit Life Care, the Company must give you approval before you or a family member may pursue it.
  - Outside employment or



# WHAT IT MEANS

## Conflict of Interest

A conflict of interest may occur when you have a competing personal interest that divides your loyalties and interferes with your ability to make objective decisions for the Company. A personal interest exists when you, your friend, or a closely related family member stands to gain as a result of your decision. Failure to use good judgement to avoid these situations can undermine the trust others place in Life Care, or damage its reputation and our ability to serve those in our care.

other service. Any outside employment, consultant relationship, or service (e.g., membership on a community board) should be discussed with your supervisor in advance to make sure any potential conflicts are addressed.

- Personal investments. You must not have substantial investment in one of Life Care’s customers, suppliers, or competitors, unless the investment complies with Life Care’s Conflicts of Interest policy. “Substantial” generally means that your investment

is large enough to potentially influence your decision-making to benefit your investment at the Company’s expense.

- Personal relationships. Avoid having a family or intimate relationship with another associate within your chain of command or if you have influence over the person’s salary or career path. If you are in such a relationship with a subordinate or supervisor, or with a current or potential business partner, you must disclose it to your supervisor or higher level manager.

### What to Do

- **Examine your loyalties.** Consider only the best interests of Life Care, its residents and patients, and

# HOW TO LIVE IT

**Q** | My sister owns a catering business with good food and moderate prices. Can I pass her name along to the associates who select these services for our facility?

*Yes. Life Care is always looking for excellent business partners and vendors, and your sister may fit this criteria. You may pass her name along, but you cannot be involved in the selection process. Also, if you are a Life Care leader, recognize that a suggestion from you may be perceived as a mandate to those who engage these services. Be careful not to send this message by making it clear you understand she must compete for the business.*

| A

**Q** | Sue and Tom are managers in different departments who are also close friends. Crystal, Tom’s daughter, works at Life Care as well and reports to Sue. Crystal is not a great worker, but Sue (who is my boss) seems to give her better schedules, more flexible work hours, and other benefits that the rest of us do not receive. Is this a conflict of interest or just unfair?

*It could be both. If Sue and Tom are such good friends that it appears the relationship clouds Sue’s objective business decisions related to Crystal, this could be a conflict of interest. This situation needs to be disclosed and addressed. Because this also feels unfair to you and likely other coworkers, even if this is not deemed to be a conflict after investigation, Sue will be informed of the perception of unfairness she has created. She will be required to work with the Human Resources department to address it.*

| A

# HOW TO LIVE IT

**Q** I overheard a manager commenting about borrowing some of the tools in our facility's maintenance department over the weekend and using them to make repairs at his home. He brought the tools back on Monday. Should I tell anyone about this?

*Absolutely. Life Care's resources such as its tools and equipment are meant to provide a safe and secure environment for our residents, patients, and coworkers. You should inform your supervisor immediately about what you heard.*

**A**

your fellow associates when making business decisions.

- **Be aware.** Recognize and avoid activities and relationships that are, or may appear to be, conflicts of interest.
- **Choose business partners wisely.** If you select business partners or vendors, choose them based only on their merit. If a friend, family member, or a company they own seems like a good potential Life Care business partner, recuse yourself from the selection process and disclose the relationship to your supervisor.
- **Speak up.** Disclose any actual, potential, or perceived conflict of interest to your supervisor or another Life Care resource.

## Protecting Company Assets

### Our Commitment

We use Company assets wisely and for appropriate purposes. Each of us is personally responsible for protecting Company assets to prevent loss or damage. Examples of Company assets include finances, facilities, equipment, medical supplies, information systems, intellectual property, and confidential Company information.

### What to Know

- Life Care assets are both tangible (e.g., things you can touch) and intangible (e.g., ideas and information). They must be used primarily for Company business.
- Personal use of Company assets is prohibited, except in limited situations. Personal use must not negatively affect productivity or the work environment.
- Life Care has the right to monitor usage of its equipment, network, and systems. Automated software may be used to monitor material created, stored, sent,

or received on its computer networks. No one should expect privacy related to their internet or email usage.

### What to Do

- **Use assets properly and for intended purposes.** You are responsible and accountable for the integrity and protection of our assets. You must take steps to protect resources that have been entrusted to you.
- **Follow all policies for use of computer equipment.** Do not share passwords or allow other people, including friends and family, to use Life Care technology resources. Company equipment may not be used to generate, store, or send offensive content. Only use software that has been properly licensed. Never add your personal software to Company computers or computer systems.
- **Avoid any harmful use of Company assets.** Never use resources in a way that causes loss or reputational damage to the Company.
- **Get prior permission to use assets for community**



### Where to find more

- Conflict of Interest Policy
- Associate Handbook for Field Associates
- Associate Handbook for Corporate Associates



**activities.** Your supervisor must pre-approve the use of the Company name and resources in any community events or fundraisers. Political fundraisers cannot be approved.

- **Managers must set up controls.** Appropriate internal controls must be established over all areas to safeguard Life Care’s assets and the accuracy of its financial records and reports.
- **Speak up about misuse.** Speak up about any actual or suspected misuse of, or accounting for, Life Care’s resources. Bring your concern to your supervisor or another Life Care resource.



### Where to find more

- Associate Handbook for Field Associates
- Associate Handbook for Corporate Associates

## Confidential Business Information

### Our Commitment

One of Life Care’s most valuable assets is our Company information. We have a duty to safeguard this confidential Life Care business asset. We are careful to physically secure such information, use it only when needed for business purposes, and avoid discussing it in places where we could be overheard.

### What to Know

- The use of computers and electronic systems makes

# WHAT IT MEANS

## Confidential Company Information and Intellectual Property

- Confidential Company Information is data related to Life Care business that is proprietary, has not been published or disclosed publicly, or is otherwise restricted from being widely communicated.
- One type of confidential information is intellectual property, which is an idea, design, or other concept owned by the Company. Sensitive data like this is often marked “confidential,” but not always. You must be able to identify confidential material by its nature.

Examples of confidential information include Company methods, processes, techniques, computer software, equipment, service marks, copyrights, research data, clinical data, marketing and sales information, personnel data, patient lists, financial data, plans, and all other undisclosed know-how and trade secrets.

confidential information accessible to many associates.

- The Company prohibits use of confidential information obtained during employment for any personal benefit without Life Care’s written consent. This prohibition continues after employment ends.
- Our business partners’ confidential business information also must be protected as if it was our own.

### What to Do

- **Properly use and disclose confidential business information.** Access and share it only for legitimate business purposes. Protect intellectual property and confidential information by disclosing it only to authorized parties.
- **Follow our information security policies.** Safeguard information in both paper

and electronic formats. Never share passwords or disclose information in public forums. Documents containing sensitive data, including information concerning residents or patients, should be handled carefully during work hours, and must be properly secured when not in use.

- **Access and maintain confidential information only on Life Care information systems.** Never store or access confidential information on a personal computer or other media. All computers and other devices, including storage media (e.g., USB devices) that will be used to store or access confidential Life Care information should be obtained from or authorized by Life Care’s Information Technology department.



# HOW TO LIVE IT

Q

A new grocery store opened in town. Its marketing person called to request a list of our associates' names and addresses so she could send them information about a grand opening giveaway. Is it okay to send the list?

No. Associate names and addresses are confidential information and cannot be disclosed without authorization. This would also be a disclosure of associate personal information that is prohibited without a legitimate business purpose. You can, however, notify the associates about the giveaway if you wish as long as you indicate that neither Life Care nor you are endorsing the store.

A

## ■ **Protect others' confidential business information.**

Business partners' pricing, agreements, and other sensitive business data must be safeguarded as securely as our own. Also protect and do not misuse the intellectual property of others, such as purchased software.

■ **Be vigilant.** If you observe individuals whom you do not recognize using terminals in your area, report this to your supervisor immediately.

■ **Report misuse, loss, and disclosure.** Promptly speak up to your supervisor or another Life Care resource if you believe confidential information has been potentially mishandled, stolen, or lost.



## Creating and Managing Our Business Records

### Our Commitment

Residents, patients, business partners, our associates, government officials, and contractors rely on the accuracy and completeness of our disclosures and business records. Every associate is responsible to maintain truthful and complete records of all types, including patient records, employment records, financial records, and all other corporate documents in a way that is consistent with our policies.

### What to Know

■ Life Care is required by law to retain certain types of medical and business records, usually for a specified period of time. Failure to do so may result

in fines, penalties, and legal liability.

- The Company has established policies and procedures to ensure appropriate maintenance, retention, and destruction of records.
- All Company records should be retained and destroyed in accordance with the schedules outlined in applicable policies. Legal liability could result if a document is destroyed before its scheduled destruction date.
- Established accounting practices and procedures must be followed to ensure the complete and accurate recording of all transactions.

### What to Do

■ **Create accurate, professional, and complete business records.** Write your business communications carefully and clearly, whether on paper or electronically. Poorly written documents and communications may create misunderstandings. Remember, anything created or sent on a computer will likely be viewed by others and



### Where to find more

- Confidentiality of Life Care Information Policy
- Associate Handbook for Field Associates
- Associate Handbook for Corporate Associates
- Computer Security Guide

# HOW TO LIVE IT

Q

We have many old records at our facility dating back several years. Is it OK if we destroy some of the older ones?

Maybe. Life Care and other entities must keep records for a certain length of time depending on the type of record and the applicable federal/state laws, regulations, and Life Care policies. In addition, there may be a “legal hold” on some records because of a legal proceeding. Please consult with your supervisor, or another supervisor in your chain of command, and Legal and Risk Services before destroying records.

A

could be used against you or the Company.

- **Know your responsibilities related to records.** Be familiar with the record-keeping procedures that apply to your job. You are accountable for the accuracy and truthfulness of the records you create and sign.
- **Comply with records retention and destruction schedules.** Make sure you know the schedules for your department, division, region, or facility. Destroy records, only according to our records retention policy, and never in response to, or in anticipation of, an investigation or audit.

If you think that documents should be saved beyond the prescribed retention period, consult with your supervisor or Legal and Risk Services.

- **Comply with legal holds.** A “legal hold” informs associates when information must be preserved for potential litigation or investigation. Information that is under a legal hold cannot be destroyed per the normal schedule until the hold is lifted by Legal and Risk Services.
- **Properly destroy protected information not needed for a task.** “Incidental” or minor documents containing protected data that may be created or obtained



in the everyday course of business must be destroyed appropriately when it is no longer needed or not required to be retained.

- **Watch for potential fraud.** Be alert for any false statements, omissions, incomplete or misleading information, or any other inaccuracy in our records. Speak up to your supervisor if you have any concerns.



## WHAT IT MEANS

### Business Records

The term “business records” covers a wide variety of documents in healthcare, including expense reports, medical records, treatment plans, billing claims, purchase agreements, benefit claims, associate records, financial statements, marketing plans, invoice payments, controlled substance records, cleaning logs, and much more. You likely work with more than one type of record at Life Care and play an important role in ensuring their accuracy and completeness.



### Where to find more

- Retention and Destruction of Medical Records Policy
- Document Management Policy - Corporate Campus

# HOW TO LIVE IT

Q

My neighbor works at a long-term care facility nearby that is a friendly competitor of Life Care. We started talking at a local event and she mentioned the struggle her facility was having with increasing costs of supplies. I told her Life Care is negotiating a new nationwide contract with a supplier that will reduce our prices and expenses, and result in a huge revenue increase for the supplier. Did I do anything wrong?

Yes. You should not talk with competitors about the circumstances under which Life Care conducts business with suppliers, other third-party partners, or customers. This potential antitrust matter should be reported to Legal and Risk Services.

A

## Antitrust, Fair Competition, and Trade Practices

### Our Commitment

We are committed to avoiding practices that limit free and open competition. We never seek to gain competitive advantages through unethical or illegal means, but rather through superior care and services. We also commit to trade practices that do not use inside information for our own benefit or the benefit of others.

### What to Know

- Anti-competitive or antitrust laws make illegal any formal or informal agreement or understanding in any format that restricts competition, whether expressed or implied.
- Such laws are designed to preserve and promote fair and honest competition. The greatest danger for violations lies in interactions with competitors.
- No associate should participate in any behavior that may be viewed as restricting competition.

- Although Life Care is a privately held company without publicly-traded stock, we are prohibited from engaging in insider trading of public company securities.

### What to Do

- **Use good judgement when talking with competitors.** Avoid discussions about competitively sensitive information or limiting competition. If such a conversation occurs, leave the meeting immediately and report the matter to Legal and Risk Services.

- **Protect competitive information of third parties.** Never share competitively sensitive information of business partners or other third parties with their competitors.
- **Use care when trading securities.** Never buy or sell securities of any other company based on material, nonpublic information about that company. Never “tip” others to do it.
- **Ask if you are unsure.** If you have questions or are uncertain about how antitrust laws may apply to a certain activity, contact your supervisor or another Life Care resource.



## WHAT IT MEANS

### Antitrust laws

Antitrust laws are complex. The rules vary based on the situation, but typical activities that may be considered antitrust violations that should be avoided or reported, include discussing the following with competitors:

- Future Life Care business plans,
- Current Life Care prices or reimbursement levels, or
- How business will be conducted with suppliers or customers.



# WHAT IT MEANS

## Insider Trading

- Insider trading is the practice of trading the securities of public companies based on material information before it is made public. If this information is passed on to others who then trade the securities, it is called “tipping.”
- Both of these practices are against the law regardless of whether you, or a person you tipped, benefit from the trade.

## Fair Dealing with Third Parties

### Our Commitment

Our business partners, suppliers, vendors, and competitors play an important part in the success of our business. Third party partners provide Life Care with critical services and goods that further our mission. Competitors motivate us to find new and better ways to deliver quality care and serve others. We value these third parties and treat them fairly, honestly, and ethically.

### What to Know

- We embrace objectivity in selecting our business partners, focusing on qualifications and diversity in the selection process.

- We gather competitive intelligence legally and ethically – never through fraud, misrepresentation, or deception.
- We do not make false claims about competitors’ capabilities or services.

### What to Do

- **Treat our business partners the way you want to be treated.** Conduct these relationships with mutual respect, honesty, fairness, and without discriminating.
- **Obtain competitive information from appropriate sources only.** Find this information in publications, websites, industry feeds, and other public sources.

- **Honor others’ confidentiality obligations.** Respect the duty of others to keep confidential the competitive information they must protect.
- **Keep non-public business information of third parties confidential.** This includes price lists, strategies, and agreements.
- **Select business partners based only on their merits.** Do not be influenced by their personal relationships or your own biases.
- **Be careful in accepting competitive information from third parties.** Know their sources and be sure the information is not protected by non-disclosure or confidentiality agreements or trade secret laws.

## Communicating with the Public

### Our Commitment

Life Care must speak with one voice when communicating to the public about disclosures, announcements, or other information. This helps us deliver messages that are objective, transparent, and consistent. We communicate professionally and honestly with the public according to the highest standards of integrity. Our social media posts and internet communications reflect good judgement and personal responsibility.

### What to Know

- Only authorized persons are permitted to speak on behalf of the Company.
- Our marketing and public-facing materials must be truthful and accurate.



# WHAT IT MEANS

## Business Partners

- Business partners refers to outside organizations or companies that do substantial amounts of work with us to fulfill a key need in our operations (e.g., contracted pharmacy provider).
- Vendors typically provide services. Suppliers provide products and materials. The term “business partners” is often used to include all three types of third parties.



- Our social media policy is designed to protect the Company and its associates rather than to restrict protected speech and the flow of useful and appropriate information. It should not be interpreted to restrict an associate's constitutional or statutory rights.

### What to Do

- **Refer requests from the media.** Refer all requests for information from any news media representative to the President's Office or Life Care's Director of Public Relations.
- **Ensure a consistent voice in our marketing messages.** All advertising or marketing materials related to Life Care must be accurate, ethical, and non-offensive. Ask for assistance from Legal and Risk

Services to review and approve any such materials before using.

- **Pre-approve outside speaking or writing engagements.** Seek approval before making public speeches, writing articles for professional journals, or other public communications, if you are identified with Life Care.
- **Access social media only for business purposes.** Associates may not access social media sites from Company-issued equipment or systems at any time unless the sites are being used to perform their job duties and have been approved by their supervisor.
- **Use good judgement on social media.** Exercise personal responsibility to avoid postings that may negatively impact Life Care's

business and reputation.

- **Speak on your own behalf in all postings.** If you identify yourself as a Life Care associate, or discuss matters related to the Company or the healthcare industry on a social media site, include a clear disclaimer stating that your opinions are yours alone and do not represent the official views of Life Care.
- **Never disclose or post residents' or patients' personal information.** This includes posting resident or patient images, personal medical information, or other personal information.
- **Seek assistance when needed for situations that may draw media attention.** Contact the Public Relations department for assistance and help. They may advise and help you have a prepared statement in case one is needed.



### Where to find more

- Social Media Policy

## HOW TO LIVE IT

**Q** | I was chatting with my coworker last night on a social media site, and we started discussing a resident. We never mentioned his real name, but we did talk about his age and medical condition. We also mentioned that he is sometimes very cranky and rude. Was this OK to do?

*Not exactly. Chatting about a resident or patient in a respectful manner without identifying him would be OK. In this case, combining his age and diagnosis may be enough to discover his identity, which is not OK. However, what is definitely against our standards is your comment about his attitude. This could reflect negatively on Life Care, especially if your connection to Life Care was clear and you did not state that you were expressing your own opinions.*

**A**

## Health Care Laws and Regulations

### Our Commitment

Life Care operates in a highly-regulated industry governed by laws and regulations that can be lengthy and complicated. Compliance with these rules is critical to Life Care’s operations and success. We are committed to upholding all the legal standards that apply to our jobs and to the Company’s business.

### What to Know

- Life Care participates in the Medicare and Medicaid programs, which are both governed by extensive laws and regulations that require our compliance.
- The federal False Claims Act prohibits knowingly submitting a false claim to the government for payment. As required by the Deficit Reduction Act of 2005, Life Care strives to prevent, detect, and eliminate fraud, waste, and

abuse in all government-funded programs from which the Company receives payments.

- As part of our commitment to integrity, we must maintain open, honest, and legal relationships with all current or potential referral sources. The two applicable federal laws related to our relationships with referral sources are the Federal Anti-Kickback Statute (AKS) and the Physician Self-Referral Law or “Stark Law.” Many states have similar laws.
- HIPAA guides us in how to use, share, and protect the personal, protected health information of our residents or patients. We uphold this law by accessing, using, or disclosing resident or patient protected health information in oral, written, or electronic form only when we have a legitimate business reason to do so or when authorizations



### Where to find more

- Gifts and Entertainment Policy
- Professional Services Agreements Policy
- Deficit Reduction Act of 2005, False Claims Act and Similar Laws Policy
- Exclusion Screening for Associates, Vendors, and Contractors Policy
- Non-Monetary Compensation Policy
- Associate Handbook for Field Associates
- Associate Handbook for Corporate Associates

or the law require it. (See section on Safeguarding the Privacy of our Residents and Patients.)

## HOW TO LIVE IT

**Q** Our medical director asked me for a raise in the hourly rate for his services. He said that he is also the medical director for another facility in the area that pays him a lot more. Can I give him the raise he is requesting?

*Maybe. If you believe the facility’s medical director deserves to be considered for a raise, you must first contact Legal and Risk Services or the Compliance department to discuss before agreeing to any raise or any change in the current contract terms. Life Care has a specific process that must be followed for all new medical director contracts as well as modifications to any existing contracts. As part of that process, the proposed compensation terms (hourly rate and maximum hours) are reviewed to ensure that they are at a “fair market” rate and are “commercially reasonable.” Consequently, you should never make promises to a physician about his or her compensation for a new, or changes to an existing, medical director agreement. In this instance, if it is determined that a raise is appropriate, a new or modified contract with the revised terms must be approved per Life Care’s policies and procedures, then signed and executed before any changes go into effect.*

| A



# WHAT IT MEANS

## Fraud, Waste, and Abuse

- Fraud is knowingly and willfully executing, or attempting to execute, a scheme to obtain improper payment from a healthcare benefit program. Fraud examples include billing for services never rendered or that are medically unnecessary.
- Waste is 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 generally results from misuse of resources rather than criminal negligence. Waste would include overprescribing medication quantities or treatments in excess of what is necessary.
- Abuse in this context 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. An example of abuse would be accidentally upcoding a diagnosis to a more profitable level.

### What to Do

- **Uphold federal and state healthcare program requirements.** This includes Medicare and Medicaid laws and regulations, federal and state guidelines, provider agreements, and accreditation standards.
- **Comply with the False Claims Act.** Report concerns regarding actual or potential false claims such as billing for services not provided, not supported by documentation, billed using the wrong code, or otherwise not billing in accordance with regulations or payor guidelines.
- **Comply with the AKS and Stark laws.** Avoid offering or accepting improper inducements. Never offer to pay, accept, or give anything

of value to anyone for resident or patient referrals. Also, do not request or accept payments or anything of value from vendors or suppliers to influence decisions regarding purchase of goods or services used for resident or patient care that is reimbursable by a federal healthcare program.

- **Follow Company policies and procedures regarding contracts.** Obtain all required approvals before signing any contracts, and only sign contracts that have first been reviewed and approved by Legal and Risk Services.
- **Follow Company policies on marketing to referral sources as well as to potential residents and patients.** The federal government has laws and

regulations regulating how healthcare services and items are marketed if they are reimbursed by federal payors. In addition, the type and value of items used for marketing is also sometimes restricted. The Company has developed and implemented policies and procedures and related training to protect Life Care and its associates involved in marketing its services. Associates should contact the Compliance department with any questions about marketing to residents, patients, or referral sources.

- **Uphold HIPAA and its Regulations.** Do your part to protect the privacy and security of our residents' and patients' protected health information. (See section on Safeguarding the Privacy of our Residents and Patients.)
- **Know Life Care policies and procedures related to applicable healthcare laws and complete required training.** The Company provides many policies and procedures and training to help you understand your responsibilities related to your job and these laws.
- **Speak up if you have questions or concerns.** Direct any questions and concerns about the laws to Legal and Risk Services or the Compliance department. Always consult with them before entering into a relationship with an individual or entity that has an actual or potential referral relationship with the Company.



# SPOTLIGHT

## Convictions, Exclusions, and Sanctions

You must inform your supervisor, another supervisor in your chain of command, or the Compliance department if you are: convicted of a felony, informed that you are under investigation, or advised that you are no longer eligible to participate in any federal or state program or contract such as Medicare or Medicaid.

## Licensure

### Our Commitment

We ensure all applicable associates are properly licensed and follow the laws and

regulations governing their respective professions.

### What to Know

■ Associates who deliver care must have up-to-date licenses or certifications necessary for their respective professions. If an associate or a contractor provides services or treatments with an inactive license or certification (e.g., expired), there may be serious consequences for the associate, contractor, and Life Care.

### What to Do

■ **Maintain active licensure and adherence to professional standards.** All associates and others acting on behalf of Life Care must maintain an active license, certification, or other credentials for the state(s) in

which they work and follow applicable state professional acts and codes of ethics at all times.

- **Notify your supervisor of any concerns.** If any issues arise such as expiration, probation, revocation, or any investigation that may lead to an action related to your professional license, inform your supervisor immediately so he or she may ensure that proper actions are taken.
- **Supervisors play a role.** Supervisors and managers are expected to be aware of these standards and promote compliance with the rules.
- **Speak up if you are unsure.** Questions or issues related to licensure or professional practice acts or codes should be referred to your supervisor or another Life Care resource.

# HOW TO LIVE IT

Q

I worked almost two weeks after my nursing license expired before I realized it, and then renewed my license online with the state board. Are there any consequences to Life Care for the gap in my licensure?

*Maybe. In some states, if you are a few days late renewing your license, you may renew it and pay a small penalty with no other consequences (e.g., effective date of renewal is still the date it expired). In other states, if you are even a day late renewing your license, you are considered unlicensed for that day. Consequently, associates must inform their supervisor immediately if they realize their license has expired before it is renewed or when any action has been (or may be) taken related to their license (e.g., suspension, probation, investigation initiated that may result in an action affecting licensure). Your supervisor will then contact the Compliance department so it may analyze the situation and ensure that all necessary actions are taken.*

| A

Q

I have a multi-state compact nursing license in Tennessee, and I transferred to Florida to work in another Life Care facility. Both Florida and Tennessee are compact states, and my Tennessee license does not expire for another 10 months. Is it OK if I wait until then to get a Florida nursing license?

*No. Once you have established residency in another state, you must apply for and obtain a nursing license in your new state of residency. There is no grace period, so you should start this process as soon as possible after your move.*

| A





### Where to find more

- Professional Credentials Policy

## Regulated Pharmaceuticals

### Our Commitment

We are conscientious and vigilant in carrying out our obligations to handle and dispense prescription drugs and controlled substances at Life Care facilities in accordance with all applicable laws, regulations, and Life Care policies and procedures.

### What to Know

- Laws covering prescription drugs and controlled substances support the integrity of our national drug distribution system and protect consumers by

ensuring that these drugs are safe, properly labeled, and administered to the correct patients.

- These laws prohibit diversion of any prescription drug or controlled substance in any amount and for any reason to an unauthorized individual or entity.
- Violation of any law or Life Care policy involving prescription drugs, controlled substances, or other pharmaceuticals may result in dismissal from employment.

### What to Do

- **Safeguard all drugs.** Every associate authorized to prescribe, dispense, or handle prescription drugs or controlled substances must maintain professional standards in safeguarding

pharmaceuticals, and in preventing unauthorized access to them.

- **Report any potential or actual violations.** If you become aware of or suspect any potential lapses in security or an actual violation of law, policy, or regulation relating to drugs, (e.g., diversion of narcotics), you should report it immediately to your supervisor or another Life Care resource.



### Where to find more

- Clinical Services Manual
- Drug Diversion Prevention Program Policy

## HOW TO LIVE IT

Q

While sweeping up in a resident's room, I found a drug blister pack on the floor containing a single dose of oxycodone HCL 10mg. It was dirty from being walked on, so I threw it away. Was this the right thing to do?

No. You should have given the blister pack to your supervisor. Oxycodone is a narcotic that requires accurate accounting to ensure that diversion or misuse doesn't occur. The facility is also required to investigate medication processes to prevent reoccurrences and ensure medications are properly destroyed.

A

Q

I know that at the end of every shift I am supposed to perform a count of all narcotics in my cart with the oncoming nurse taking over my duties. Sometimes it gets hectic, and we just sign off on the count sheet without conducting the count. As long as we perform the counts most of the time, it is OK, right?

No. Life Care has created and implemented policies and procedures to comply with the applicable laws and regulations to properly control and account for narcotics to prevent and detect drug diversion. You have a responsibility as an associate to protect the resident and patient and supply medications as ordered by the physician. Not performing the required drug count can result in undetected drug diversions, residents and patients not receiving care as ordered, or the Company and its associates being sanctioned.

A

# HOW TO LIVE IT

**Q** | I volunteer work at a local non-profit group that asked me if Life Care would donate its old furniture for their office. They do good work in the community that benefits the elderly. Would the Company donate the furniture?

*Maybe. It must first be made clear that Life Care will not seek or accept any improper advantage from making the donation. Then it must align with the Company's charitable giving policies. To make sure these issues are addressed, corporate donation requests must be referred to the Life Care President's Office or, if the request involves a facility location, refer the matter to the Regional or Division Vice President for approval and processing.*

**A**

## Supporting Our Communities

### Our Commitment

Life Care strives to be a responsible citizen in the communities where it operates. While we each are encouraged to be active in our community by supporting events and causes, we avoid pressuring others to support or contribute to our favorite charities.

### What to Know

- Life Care encourages associates to become actively involved in their communities.
- Life Care provides support to various educational, cultural, and civic endeavors. Such support may involve gifts of time, scholarships, sponsoring activities, and serving on community or university boards.
- Business partners may request contributions from Life Care for charitable causes. These must be approved through the Company process, like all other contributions.

### What to Do

- Use good judgment when getting involved. Carefully consider your participation in community activities so it does not conflict with your responsibilities to Life Care. If a business partner asks you for a contribution from your own funds, make sure it will not give the appearance of a conflict of interest.
- Make sure your charitable causes are clearly your own. Ensure that your personal support of charitable causes is not viewed as that of the Company.

## Political Activities

### Our Commitment

Life Care supports and encourages the voluntary participation of associates in the political process, as they desire. This is one of every American's most basic rights.

### What to Know

- Federal and state laws limit the nature and extent of individual and organizational political participation.



## SPOTLIGHT Lobbying

- Lobbying is the process where interest groups or lobbyists attempt to influence public policy through contacts with public officials. At times, Life Care may ask certain managers to contact members of government and other officials, in full compliance with applicable lobbying laws, to advocate for the Company's position on issues. Life Care may periodically engage lobbyists or lobbying firms to help promote its interests, according to established internal controls to assure that all activities are legal.
- No associate should ever engage in lobbying, or engage anyone else to act as a lobbyist, without prior authorization from the Chief Executive Officer.

# HOW TO LIVE IT

Q

Elections are coming up, and in order to vote, I need to go to the polling place during work hours. Is this allowable?

*Yes. Associates are expected to schedule their voting time so as not to interfere with work time, but in instances where work schedules may interfere with your ability to vote either before or after work, you will be given reasonable time off to vote in accordance with state law. You must give your supervisor notice of your need for leave for this purpose prior to election day.*

A

Q

A political candidate that I support has added elder care issues to his political platform. He wants to hold a rally in town and is looking for someone to donate the location. Would Life Care be willing to host this in one of their buildings?

*No. Life Care encourages its residents and patients to exercise their right to participate in the election process and encourages elected officials and candidates to visit our facilities to meet with them. However, the Company believes it would be improper to host a rally for a candidate seeking election or reelection or allow them to solicit donations from our residents, patients, their families, or associates at our facility.*

A

- Associates may make personal political contributions or communicate their personal beliefs to elected officials, as long as it cannot be viewed as coming from Life Care.
- Federal law prohibits reimbursement of individuals for their personal political contributions.
- Organizational political activities differ from those that are personal. Life Care may occasionally speak out on issues of importance.
- **Speak and act on your own behalf.** Ensure that your personal political views and activities are not viewed as those of the Company. Unless specifically authorized to represent Life Care, clearly label any personal communication with legislators as your own.
- **Refer inquiries about Life Care's political position.** If you are contacted by legislators or regulators regarding Life Care's position on public issues, you should refer them to your supervisor or the Public Relations department.

## What to Do

- **Use your own time and resources.** Your political activities must not interfere with your responsibilities at Life Care. Company resources such as copiers, phones, computers, and offices must never be used for your political activities.



### Where to find more

- Associate Handbook for Field Associates
- Associate Handbook for Corporate Associates





## Our Compliance and Ethics Program

### Our Commitment

Life Care is committed to conducting its business ethically and with integrity. This includes preventing and detecting fraud and abuse and complying with all state and federal laws that apply to our jobs and our business to deliver quality care to our residents and patients. Life Care designed and implemented its Compliance and Ethics Program (Program) to promote and support ethical and legal conduct and a culture of integrity through accountability to a system of compliance and ethics standards.

### What to Know

The Program includes the following elements:

- Risk assessment to identify compliance, ethics, and reputational risks and evaluate the strength of related internal controls;
- Oversight by a Chief Compliance Officer supported by a Compliance department and a Compliance Advisory Board

comprised of senior leaders;

- Written standards of conduct, policies, and procedures;
- Education and training programs for all affected persons;
- Open lines of communication including reporting mechanisms, such as EthicsPoint;
- Monitoring and auditing to identify and reduce problems;
- Prompt investigation and response; and
- Enforcement of appropriate corrective action.

### What to Do

- **Comply with Life Care’s standards, rules, and requirements.** Uphold our Code, complete all required training on a timely basis, cooperate with investigations and audits, speak up to Company resources with ethics or compliance questions or concerns, and never retaliate.
- **Report potential or actual misconduct.** The Company provides many



## SPOTLIGHT

### External Reporting

In addition to Life Care’s internal reporting mechanisms, associates and others who have concerns about the safety or quality of care provided may report these concerns to an appropriate federal or state agency. In these instances, the reporters must not be the subject of retaliation, retribution, or harassment by Life Care, any of its associates, or anyone else who must uphold this Code.

resources to help you with your concerns.

- **Avoid consequences of non-reporting.** Failure to report known or suspected wrongdoing may itself result in disciplinary action against those who failed to report the incident.



### Where to find more

- Compliance and Ethics Program

# LIFE CARE RESOURCES

Life Care provides several resources to help you speak up. Raising concerns is the right thing to do even if you are unsure if the issue is a problem.



## Your Supervisor

He or she can answer your questions and help you decide the best course of action in most situations – or connect you to other Company resources that can.



## Another Supervisor in Your Chain of Command

For issues involving your supervisor or if you are uncomfortable speaking to him or her, speak to another supervisor in your reporting chain or another leader with whom you feel most comfortable.



## Human Resources Department

For a human resources or general workplace issue that you are unable to resolve with your supervisor, contact your facility human resources manager, division human resources director, or the corporate Human Resources department.



## Legal and Risk Services

For any legal issues that arise such as contacts by law enforcement, notice of investigations, or receipt of subpoenas, contact Legal and Risk Services.



## Information Technology Customer Support Center

For suspected violations of Life Care's network or computer systems, call the Customer Support Center.

Outside of the Cleveland, Tennessee, calling area - (800) 275-LCCA x5222  
Within the Cleveland area - (423) 339-8313



## Privacy Officer

If you have a question or concern about an actual or suspected HIPAA Privacy issue, please contact Life Care's Privacy Officer at (423) 473-5554 or at [privacy\\_officer@lcca.com](mailto:privacy_officer@lcca.com).

# COMPLIANCE DEPARTMENT

Questions or concerns also may be reported directly to the Compliance department in one of the following ways:



## Use Life Care's confidential disclosure system, EthicsPoint, to provide a description of the issue.

Call the toll-free hotline (without caller-ID) at 1-877-423-8305; or

Use the internet: [www.LCCA.ethicspoint.com](http://www.LCCA.ethicspoint.com)

EthicsPoint is available 24/7/365 and managed by a third-party vendor.

If you choose to submit an anonymous report via EthicsPoint, a six-digit case number will be provided so you may later submit more information related to your original report. This also allows the Compliance department to communicate with you (e.g., ask questions) and still protect your anonymity. No one at Life Care has access to your case number.

You may also submit a report including your name but request anonymity. If you do so, your anonymity will be protected up to the limits of the law.

Translation services are available for both written and verbal reports.



## Fax a written description of the matter. 1- (423) 339-8318



## Email: [compliance\\_department@lcca.com](mailto:compliance_department@lcca.com)



## Mail a written description of the matter.

Chief Compliance Officer  
Life Care Centers of America, Inc.  
3001 Keith St. NW  
Cleveland, Tennessee 37312



## FINAL MESSAGE

Thank you for reading our Code. We have designed it to outline what is expected from all of us, and as a useful resource when you have questions or are unsure what to do in a difficult or questionable situation. Remember, however, that you do not have to tackle problems on your own. All the resources listed in the Code are ready to help when you need them. Please feel free to contact the Compliance department if you have any questions or concerns.

Our residents and patients count on us to always do the right thing and give them the best quality care. Their trust in us reinforces our continuing commitment to serve.

A handwritten signature in black ink that reads "Wayne T. Griffin Jr." with a stylized flourish at the end.

Wayne T. Griffin Jr.  
*Senior Vice President - Compliance*  
*Chief Compliance Officer*



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