

NATIONAL CHURCH RESIDENCES  
COMPLIANCE AND ETHICS PROGRAM

# CODE OF CONDUCT



National Church Residences



UPDATED July 1, 2023

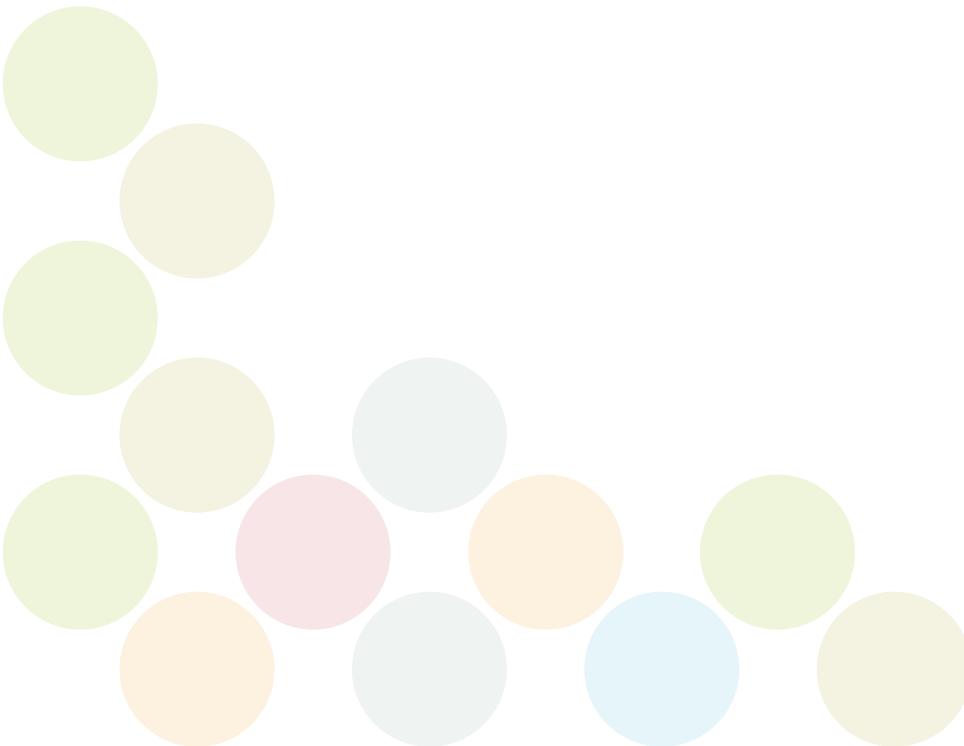
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Dear Team Member,

Thank you for joining our mission! We have a long tradition of providing housing and supportive services to older adults in a way that demonstrates love and compassion. This heritage enables us to share our values with the seniors we serve.

This document, called the Code of Conduct, not only reflects our heritage and values but also guides our behavior in a way that is both ethical and compliant with applicable laws, statutes, and regulations. Some of these laws and regulations are complicated, so please read this document carefully, ask questions, and when in doubt, speak up!

I thank you for your commitment and contribution to National Church Residences' mission, values and, most importantly, to our seniors.

Sincerely,



Susan DiMichele, Esq.  
CEO

## SCOPE OF OUR PROGRAM . . . . .

**Originating from a Christian Commitment of Service, National Church Residences provides high quality care, services, and communities for seniors.** Our Core Values—Purposeful Service, Compassion, Equity & Inclusion, Excellence, and Servant Leadership—are the foundation of the Compliance and Ethics Program.

This Code of Conduct guides us as we comply with the laws, regulations, and guidelines that are important to our mission. The Compliance and Ethics Program further fosters a culture that promotes legal and ethical behavior and creates processes that detect and prevent fraud, waste, abuse, and policy violations. **The Code of Conduct is supported by our compliance policies and procedures and should be read and understood jointly with those policies and procedures.**

All individuals, including employees, contractors, volunteers, directors, and officers (collectively referred to as Team Members) are valued members of our team in providing care and services to our clients. We use the term client to refer to individuals who receive the various types of housing, healthcare and other services that we provide.

If you have questions regarding this Code of Conduct, compliance policies, or related references, please reach out to your supervisor, any member of the Compliance Committee, or the Compliance Officer.

## COMPLIANCE OFFICER . . . . .

The General Counsel Julie Woolley serves as our Compliance Officer. She has the responsibility to assist the Compliance Committee, the CEO, and the Board of Directors in designing and overseeing efforts in establishing, maintaining, and monitoring compliance within our organization.



She can be reached at:  
**Phone** (866) 267-2609 (main department number)  
**Email** [Compliance@nationalchurchresidences.org](mailto:Compliance@nationalchurchresidences.org)

## COMPLIANCE PROGRAM MANAGEMENT . . . . .

Our Board of Directors, through the CEO, carries the overall responsibility for creating a culture that values and emphasizes compliance and integrity. The Compliance Officer has been appointed by the CEO and Board of Directors and is responsible for coordinating the day-to-day compliance activities and chairing the Compliance Committee.

The National Church Residences' Compliance Committee is comprised of members of the management team and other key staff positions, including the Privacy Officer and the Security Officer. We have also created sub-committees for our three service divisions – affordable housing, senior living, and senior services. Each sub-committee chair provides regular reporting to the Compliance Committee.

As a Team Member, you are responsible for supporting the Compliance and Ethics Program in every aspect of your workplace behavior.

The Code of Conduct discusses the importance of:

## **CARE EXCELLENCE**

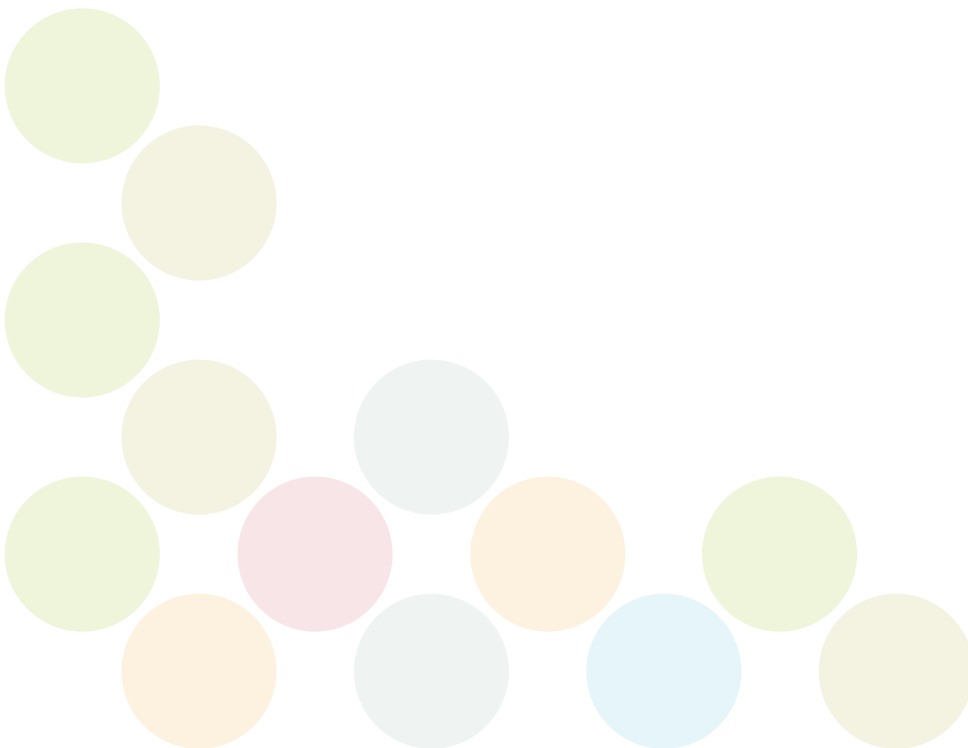
Providing quality, compassionate, respectful, and clinically-appropriate care.

## **PROFESSIONAL EXCELLENCE**

Maintaining ethical standards of housing, healthcare, and general business practices.

## **REGULATORY EXCELLENCE**

Complying with federal and state laws, regulations, and guidelines that govern healthcare, housing services, and other services we provide.





# A SHARED RESPONSIBILITY AND PERSONAL OBLIGATION

All Team Members are required to abide by our Code of Conduct and the Compliance and Ethics Program as a condition of employment or business relationship. The Code of Conduct sets forth mandatory standards.

As we are each responsible for following the Code of Conduct in our daily work, we are also responsible for enforcing it. This means that you have a duty to report any problems you observe or perceive, regardless of your role.

As a Team Member, you must help ensure that you are doing everything practical to comply with applicable laws. If you observe or suspect a situation that you believe may be unethical, illegal, unprofessional, or wrong, or you have a clinical, ethical, or financial concern, you must report it. You will not be retaliated against for reporting your concern. You are expected to satisfy this duty by complying with the **Three Step Reporting Process**, described below.

## REPORTING COMPLIANCE CONCERNS . . . . .

### THE THREE STEP REPORTING PROCESS SPEAK UP!

**First**, talk to your supervisor. He or she is most familiar with the laws, regulations, and policies that relate to your work.

**Second**, if you do not want to talk to your supervisor, seek out another member of the leadership team or someone from human resources.

**Third**, if you still have a concern, contact the Compliance Officer or a member of the organization's Compliance Committee.

**You may also call the toll free Compliance Line number at any time. When in doubt, please call!**

## COMPLIANCE LINE . . . . .

**800-211-2713**      **You may call ANONYMOUSLY if you choose.**

The Compliance Line is available 24 hours a day, 7 days a week, for callers to report compliance-related issues. Concerns that are reported to the Compliance Line are taken seriously.

You can make calls to the Compliance Line without fear of reprisal, retaliation, or punishment for your actions. Anyone, including a supervisor who retaliates against a Team Member for contacting the Compliance Line or reporting a compliance issue in any other manner, will be disciplined.



Your conduct matters! All Team Members are expected to maintain our standards of honesty, integrity, and professional excellence, every day.

## HIRING AND EMPLOYMENT PRACTICES . . . . .

National Church Residences is committed to fair employment practices. When hiring and evaluating, we:

- Comply with federal, state, and local Equal Employment Opportunity laws;
- Conduct employment screenings to protect the integrity of our workforce and welfare of our clients and Team Members.
- Require all who need licenses or certifications to maintain their credentials in compliance with state and federal laws. Documentation of licenses or certifications must be provided.

## EMPLOYEE SCREENING AND REPORTING . . . . .

Employees are screened in accordance with federal and state law to ensure the safety of our clients. Screening procedures have been implemented and are conducted prior to hire and regularly thereafter in accordance with applicable laws and best practices.

As long as you are employed or affiliated with National Church Residences, you must immediately report to your supervisor if action has been taken against any license or certification required for your employment in our organization.

## LICENSURE, CERTIFICATION AND EXCLUSION SCREENING . . . . .



We are committed to ensuring that only qualified professionals provide care and services to clients. Practitioners and other professionals treating clients must abide by all applicable licensing, credentialing and certification requirements. In addition, every effort has been made to validate licenses and certification through the appropriate state or federal agency.

WORKPLACE SAFETY . . . . .

Maintaining a safe workplace is critical to the well-being of our clients, visitors, and co-workers. Every Team Member should become familiar with safety regulations and emergency plans regarding fire and disaster in his or her work area.

In addition to organizational policies, we must abide by all environmental laws and regulations. You are expected to follow organizational safety guidelines and to take personal responsibility for helping to maintain a secure work environment. If you notice a safety hazard, you must take action to correct it if you can or report it to your supervisor immediately.

DRUG AND ALCOHOL ABUSE . . . . .

We take seriously our commitment to provide quality care. To that end, you are prohibited from consuming any substance that impairs your ability to provide quality services or otherwise perform your duties. You may not use, sell, or bring on our property alcohol, illegal drugs, and/or narcotics or report to work under the influence of alcohol, illegal drugs, and/or narcotics.

Illegal, improper, or unauthorized use of any controlled substance that is intended for a client is prohibited. If you become aware of any improper diversion of drugs or medical supplies, you must immediately report the incident to your department supervisor, the Compliance Officer, or use the Compliance Line. Failure to report a known instance of noncompliance with this policy may result in disciplinary action against the Team Member, up to and including termination.

GIFTS . . . . .

You may not accept any tip or gratuity from clients. You may not receive individual gifts from clients or give gifts to clients, other than those of nominal value.



Team Members may accept gifts from “gift funds” established from client funds so long as the gifts provided to employees are of equal value and the contributions by clients to the “gift fund” are voluntary and anonymous such that there is no way for an employee who benefits from the fund to determine whether a client contributed to the fund.

You may not borrow money from nor lend money to clients; nor may you engage with clients in the purchase or sale of any item. No Team Member may accept any gift from a client under a will or trust instrument except in those cases where they are related by blood or marriage.

Team Members may not serve as a client’s executor, trustee, administrator, or guardian or provide financial services or act under a power of attorney for a client except in those cases where they are related by blood or marriage unless otherwise allowed by state law.

### BUSINESS COURTESIES . . . . .

National Church Residences prohibits any Team Member from offering, giving, soliciting, or accepting business or professional courtesies including entertainment and gifts of substantial value that could be interpreted as attempts to influence decision making. Under no circumstances will a Team Member solicit or accept business courtesies, entertainment or gifts that depart from the Business Courtesies policy, unless authorized by the Compliance Officer.

### CONFLICT OF INTEREST . . . . .

A conflict of interest exists any time your loyalty to the organization is, or even appears to be, compromised by a personal interest. There are many types of conflicts of interest and these guidelines cannot anticipate them all, however the following provide some examples:

- Financial involvement with vendors or others that would cause you to put their financial interests ahead of ours;
- An immediate family member who works for a vendor or contractor doing business with the organization and who is in a position to influence your decisions affecting the work of the organization;
- Participating in transactions that put your personal interests ahead of National Church Residences or cause loss or embarrassment to the organization;
- Taking a job outside of National Church Residences that overlaps with your normal working hours or interferes with your job performance; or
- Working for National Church Residences and another vendor that provides goods or services at the same time.

All Team Members must seek guidance and approval from our Compliance Officer before pursuing any business or personal activity that may constitute a conflict of interest.

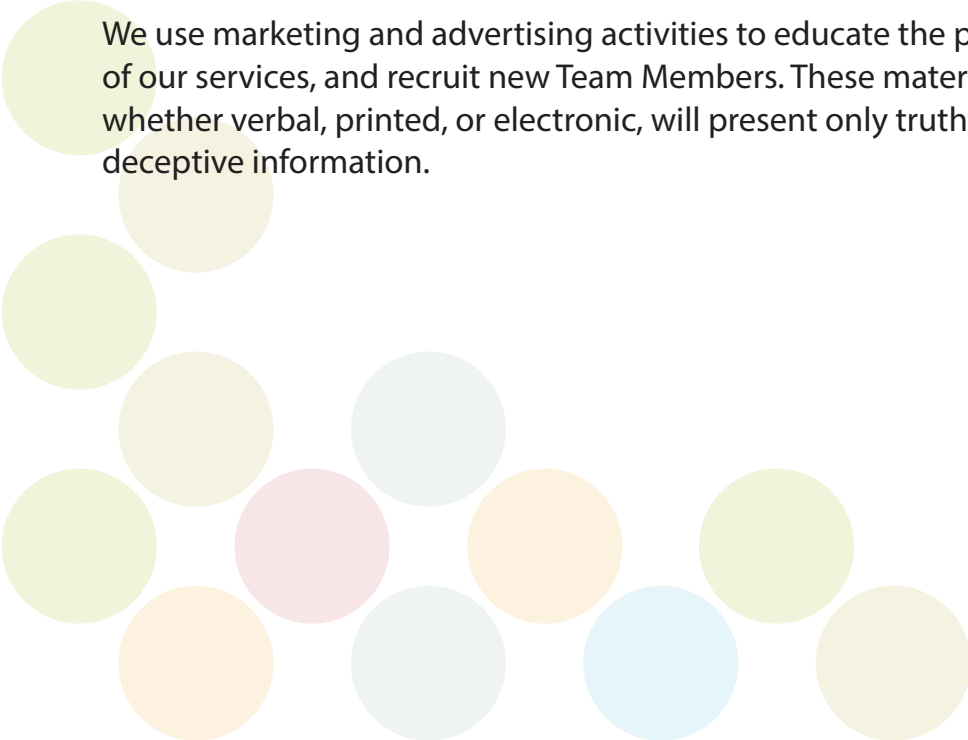
## VENDOR RELATIONSHIPS . . . . .

Arrangements between National Church Residences and its vendors must always be approved by management. Agreements with contractors and vendors who receive our clients’ health information, with the exception of care providers, may require a Business Associate Agreement (BAA) with the organization as defined by HIPAA. Contractors and vendors who provide our clients’ care, reimbursement, or other services to client beneficiaries of federal and/ or state healthcare programs are subject to the Code of Conduct and must:

- Maintain defined standards for the products and services they provide to us and our clients;
- Comply with all policies and procedures as well as the laws and regulations that apply to their business or profession;
- Maintain all applicable licenses and certifications and provide evidence of sanction screening, current workers compensation, and liability insurance as applicable; and
- Require that their employees comply with the Code of Conduct and the Compliance and Ethics Program and complete related training as appropriate.

## MARKETING AND ADVERTISING . . . . .

We use marketing and advertising activities to educate the public, increase awareness of our services, and recruit new Team Members. These materials and announcements, whether verbal, printed, or electronic, will present only truthful, informative, non-deceptive information.



Keeping up with the most current rules and regulations is a big job and an important one. We are all responsible for learning and staying current with the federal, state, and local laws, rules, and regulations, as well as the policies and procedures that apply to our job responsibilities.



## BILLING AND BUSINESS PRACTICES . . . . .

We are committed to operating with honesty and integrity. Therefore, all Team Members must ensure that all statements, submissions, and other communications with clients, prospective clients, the government, suppliers, and other third parties are truthful, accurate, and complete.

We are committed to ethical, honest billing practices and expect you to be vigilant in maintaining these standards at all times. We will not tolerate any false or inaccurate coding or billing. Any Team Member who knowingly submits a false claim, or provides information that may contribute to submitting a false claim such as falsified clinical documentation, to any payor – public or private – is subject to termination. In addition, legal or criminal action may be taken.

Prohibited practices include, but are not limited to:

- Billing for services or items that were not provided or costs that were not incurred;
- Duplicate billing - billing for items or services more than once;
- Billing for items or services that were not medically necessary;
- Assigning an inaccurate code or client status to increase reimbursement;
- Providing false or misleading information about a client's condition or eligibility;
- Failing to identify and refund credit balances in a timely manner;
- Submitting bills without supporting documentation;
- Soliciting, offering, receiving, or paying a kickback, bribe, rebate, or any other remuneration in exchange for referrals; and/or
- Untimely entries into medical records.

**IF YOU OBSERVE OR SUSPECT THAT FALSE CLAIMS ARE BEING SUBMITTED** or have knowledge of a prohibited practice, you must immediately report the situation to a supervisor, the Compliance Officer, or call the Compliance Hotline at 800-211-2713. Failure to report a known prohibited practice will subject you to disciplinary action up to and including termination.

### FINANCIAL PRACTICES AND CONTROLS . . . . .

Ensuring that financial and operating information is current and accurate is an important means of protecting assets. Each one of us must make sure that all information provided to bookkeepers, accountants, reimbursement staff, internal and external auditors, and compliance staff is accurate and complete. This includes ensuring the accuracy of clinical documentation which supports our reimbursement for healthcare services and resident documentation related to rental agreements and subsidies. We must also comply with federal and state regulations when maintaining clinical records, tenant records, accounting records and financial statements, and cooperate fully with internal and external audits.

### FAIR DEALING . . . . .

All Team Members must deal fairly with clients, suppliers, competitors, and one another. No Team Member shall take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

### DOCUMENT CREATION, USE AND MAINTENANCE . . . . .

Every Team Member is responsible for the integrity and accuracy of documents, records, and e-mails including, but not limited to, client medical records, tenant files, billing records, and financial records. No information in any record or document may ever be falsified or altered.



You must not disclose, internally or externally, either directly or indirectly, confidential information except on a **need to know basis** and in the performance of your duties. Disclosure of confidential information externally must follow organizational policies.

## GOVERNMENT INVESTIGATIONS . . . . .

National Church Residences is committed to cooperating with requests from any governmental inquiry, audit, or investigation.

In complying with our policy you must not:

- Lie or make false or misleading statements to any government investigator or inspector;
- Destroy or alter any records or documents;
- Attempt to persuade another Team Member or any person to give false or misleading information to a government investigator or inspector; or
- Be uncooperative with a government investigation.

If you receive a subpoena or other written or oral request for information from the government or a court, contact the legal department or the Compliance Officer before responding.

## DISCIPLINARY ACTION . . . . .

In enforcing this Code of Conduct, we will apply fair and consistent discipline.

Any Team Member who violates any of these standards and/or policies and procedures is subject to discipline up to and including termination.

If you fail to report noncompliance with the Code of Conduct, policies and procedures, or applicable federal or state laws, you will be subject to discipline up to and including termination.



REFERRALS AND KICKBACKS . . . . .

Team Members and related entities often have close associations with local healthcare providers and other referral sources. To demonstrate ethical business practices, we must make sure that all relationships with these professionals are open, honest, and legal.

Client referrals are accepted based solely on the clinical needs and our ability to provide the services. National Church Residences never solicits, accepts, offers, or gives anything of value in exchange for client referrals or in exchange for purchasing or ordering any good or service for which payment is made by a federal health care program. Anything of value includes any item or service of value including cash, goods, supplies, gifts, "freebies," improper discounts, or bribes.

Accepting kickbacks is against our policies and procedures and also against the law. A kickback is anything of value that is received in exchange for a business decision such as a client referral. To assure adherence to ethical standards in our business relationships, you must:

- Verify all business arrangements with physicians or other healthcare providers or vendors in a written document; and
- Comply with all state and federal regulations when arranging referrals to physician-owned businesses or other healthcare providers.

You cannot request, accept, offer, or give any item or service that is intended to influence – or even appears to influence – the referral, solicitation, or provision of healthcare service paid for by any private or commercial healthcare payor or federal or state healthcare program, including Medicare and Medicaid, or other providers.

INDUCEMENTS TO PROSPECTIVE CLIENTS . . . . .

You may not provide anything of value including goods, services, or money exceeding \$10 per item or \$50 annually to prospective healthcare clients or any beneficiary of a federal or state healthcare program that you know or should know will likely influence that person's selection of a provider of healthcare services.

VOLUNTARY DISCLOSURE . . . . .

It is our policy to voluntarily report known overpayments and any improper/irregular conduct, including fraudulent conduct, which affects any federal or state healthcare program. Reporting will be completed within the time frames identified under the Patient Protection and Affordable Care Act.

**OUR TEAM MEMBERS WHO PROVIDE HEALTHCARE AND RELATED SUPPORT SERVICES ARE SUBJECT TO ADDITIONAL REQUIREMENTS** based upon various healthcare laws and regulations. These additional compliance and ethics standards are outlined below.

## CLIENT RIGHTS . . . . .

All of our clients must be treated in a manner that preserves their dignity, autonomy, self-esteem and civil rights. If you see or hear of any incidents violating our client's rights, you must speak up! When in doubt, always report your concern. In addition, clients receiving healthcare services (whether in skilled nursing or at home) have clearly defined rights. A document describing these rights is provided to each client prior to service. In order to honor these rights, we must:

- Make no distinction in the service, admission, transfer, or discharge of a client, or in the care we provide on the basis of race, gender, age, religion, national origin, disability, color, marital status, veteran status, medical condition, sexual orientation, or other protected class status so long as National Church Residences can meet the service needs of the client;
- Protect every client from physical, emotional, verbal, or sexual abuse or neglect;
- Protect all aspects of client privacy and confidentiality;
- Respect clients' personal property and money and protect it from loss, theft, improper use, and damage;
- Respect the right of clients and/or their legal representatives to be informed of and participate in decisions about their care and treatment;
  - Respect the right of clients and/or their legal representatives to access their medical records as required by the Health Information Portability and Accountability Act (HIPAA);
  - Recognize that clients have the right to consent to or refuse care and the right to be informed of the medical consequences of such refusal;
- Protect clients' rights to be free from physical and chemical restraints; and
- Respect the clients' right to self-determination and autonomy.



Specific rights relative to skilled nursing facility residents, home care clients, hospice clients, and Florida assisted living residents are available within the admission packet for each business line.

**ABUSE AND NEGLECT** . . . . .

We will not tolerate any type of client abuse or neglect – physical, emotional, verbal, financial, or sexual. In addition, under certain laws, healthcare clients must be protected from abuse and neglect by Team Members, family members, legal guardians, friends, or any other person. This standard applies at all times.

Federal law defines abuse as the willful infliction of injury, unreasonable confinement, intimidation, or punishment with resulting physical harm, pain, or mental anguish. Abuse also includes the deprivation by an individual, including a caretaker, of goods or services that are necessary to attain or maintain physical, mental, and psychosocial well-being. Instances of abuse of all residents, irrespective of any mental or physical condition, cause physical harm, pain or mental anguish. It includes verbal abuse, sexual abuse, physical abuse, and mental abuse, including abuse facilitated or enabled through the use of technology.

**ANY TEAM MEMBER WHO ABUSES, NEGLECTS, OR FINANCIALLY EXPLOITS A CLIENT** is subject to immediate termination. In addition, legal or criminal action may be taken.

**ABUSE AND NEGLECT MUST BE REPORTED IMMEDIATELY TO YOUR SUPERVISOR OR OTHER MEMBER OF MANAGEMENT.**

**ELDER JUSTICE ACT** . . . . .

The Elder Justice Act requires timely reports of **ANY REASONABLE SUSPICION OF A CRIME AGAINST A RESIDENT OF A LONG TERM CARE FACILITY.** You must report your reasonable suspicion to the state agency and local law enforcement **WITHIN 2 HOURS** if the suspected crime involves serious bodily injury **OR WITHIN 24 HOURS** if the suspected crime does not involve serious bodily injury.

**DO NOT CALL THE COMPLIANCE LINE** for allegations of abuse or neglect.

**Report abuse or neglect immediately to your supervisor!**

**CLIENT CONFIDENTIALITY / HIPAA** . . . . .

All Team Members receiving HIPAA-protected information must use and disclose medical, financial, or personal information only in a manner consistent with the HIPAA Privacy policies and procedures and state and federal law. You are responsible for keeping client protected health information (PHI) confidential. PHI is defined as individually identifiable health information that is transmitted or maintained in any form or medium, including electronic health information.

Any unauthorized exposure of PHI which compromises the security or privacy of information is a potential breach.

**If you become aware of a breach of any protected or sensitive information it is important that you report it immediately to your supervisor or the Privacy Officer. Julie Woolley, General Counsel, serves as the Privacy Officer. She can be reached at 866-267-2609 (main department number), or by email at [Privacy@nationalchurchresidences.org](mailto:Privacy@nationalchurchresidences.org).**

If the disclosure results in a breach, National Church Residences must investigate and comply with all state and federal HIPAA regulations for breach notification.

**PROVIDING QUALITY CARE** . . . . .

Our primary commitment is to provide the care, services, and resources necessary to help each client reach or maintain his or her highest possible level of physical, mental, and psychosocial well-being. National Church Residences has policies and procedures and provides training and education to help each Team Member strive to achieve this goal.

Our care standards include:

- Accurately assessing the individual needs of each client and developing interdisciplinary care plans that meet those assessed needs;
- Reviewing goals and plans of care to ensure that the client’s ongoing needs are being met;

- Providing only medically necessary, physician prescribed services and products that meet the client’s clinical needs;
- Confirming that services and products (including medications) are within accepted standards of practice for the client’s clinical condition;
- Ensuring that services and products are reasonable in terms of frequency, amount, and duration;
- Measuring clinical outcomes and client satisfaction to confirm that quality of care goals are met;
- Providing accurate and timely clinical and financial documentation and record keeping;
- Ensuring that clients’ care is given only by properly licensed and credentialed providers with appropriate background, experience, and expertise;
- Reviewing client care policies and procedures and clinical protocols to ensure that they meet current standards of practice; and
- Monitoring and improving clinical outcomes through a Quality Assurance Performance Improvement (QAPI) Committee with established benchmarks.

## MEDICAL SERVICES . . . . .

When we provide healthcare, we are committed to providing comprehensive, medically necessary services for our clients. We have Medical Directors who provide oversight to physicians and other medical providers and services as defined by state and federal regulations. Each Medical Director oversees the care and treatment policies and is actively involved in the Quality Assurance Performance Improvement (QAPI) Committee.



# CONCLUSION

The success of the National Church Residences' Compliance and Ethics Program depends on YOU! As a Team Member, your duty is to ensure that the organization is doing everything practicable to comply with applicable laws and regulations. You are expected to satisfy this duty by performing your responsibilities in accordance with professional standards, the regulations guiding our business practices, and our policies and procedures. Please speak up if you have any questions.



## YOUR COMPLIANCE OFFICER

**Julie M. Woolley**

2245 North Bank Drive  
Columbus, Ohio 43220

Phone 866-267-2609 (Department Main Number)

Email [Compliance@NationalChurchResidences.org](mailto:Compliance@NationalChurchResidences.org)

## TOLL-FREE COMPLIANCE HOTLINE

**800-211-2713**



# CODE OF CONDUCT



## CENTRAL OFFICE

National Church Residences

2245 North Bank Drive

Columbus, Ohio 43220

Phone: 800-338-2151

Fax: 717-591-6330

Web: [NationalChurchResidences.org](http://NationalChurchResidences.org)

