LIFE ENRICHING COMMUNITIES

Compliance and Ethics Program

CODE OF CONDUCT

Also available on the LEC website https://LEC.org/

Code of Conduct

Life Enriching Communities is an Ohio not-for-profit corporation providing services to individuals living in our Continuing Care Retirement Communities.

As a part of the LEC team, you must follow our Compliance and Ethics Program and the Code of Conduct. Our team includes individuals who provide care and services throughout the organization as well as those who support our work through contracts and other agreements. We call these individuals and team members “Associates”.

Senior living communities like ours must follow many rules and regulations from both the state and federal governments. This Code of Conduct will help you understand how your actions must align with this wide range of rules and standards of conduct, so we can ensure that we provide the highest level of care and services and prevent fraud, waste, and abuse.

Our Compliance Officer is Tim Grimes, and the Compliance Liaison at your Community is the Executive Director.

FROM THE CEO's Desk

Dear Associate,

At Life Enriching Communities (LEC) our mission is to provide exceptional everyday experiences. We have a very long tradition of commitment to senior living that fosters a culture where people find life with meaning and purpose, enriching opportunities and experiences, and meaningful connections and relationships.

We strive to empower a culture where people are living with confidence and thriving in community. We operate in a dynamic environment involving high expectations, regulations and laws. As we aim to be proactive and maintain and improve the quality of our services and workplace, our Compliance and Ethics Program is one of the efforts we utilize in making the right decisions. You are a vital part of this program.

This **Code of Conduct**, the related **Compliance Plan** and **Policies and Procedures** exists to ensure that the decisions we make in our daily responsibilities are both ethical and compliant. The Code of Conduct document will explain the key aspects of the Compliance and Ethics Program, so you can apply its guidelines in your work at LEC.

Well-being is a hallmark for the residents and associates at LEC.

Thank you for working in a manner that protects our living and work environment and ensures our compliance with the laws, regulations, and values to which we are committed. This provides a springboard for everyone involved in senior living to find fulfillment and the opportunity to live their best life.

Sincerely,



Scott M. McQuinn

President/CEO

Life Enriching Communities

Introduction

This **Code of Conduct** is a guide to appropriate workplace behavior. Refer to this guide whenever you are unsure of how to make the right decision or how to respond to a situation.

We use the term "Associate" to define the various individuals who are associated with Life Enriching Communities – all the individuals, employees, contractors, volunteers, directors, and officers who are members of our team in providing care and services to our residents. We use the term "resident" to refer to individuals who receive the various types of healthcare and other supportive services we provide.

Associates in our workforce all share a commitment to legal, ethical, and professional conduct in the workplace. This Code of Conduct is one of three documents that guide that work. For more detailed information, you can read the **Compliance Plan** and the **Compliance Policies and Procedures** (found in LEC's Policy Manager database).

Our Responsibilities

As part of the LEC team, we each share a responsibility and commitment to our residents, their families and each other. As part of your commitment to the team, it is important that you always make ethical and legally appropriate decisions. If you see anyone else on the team violating the Code of Conduct, it is also your responsibility to report those violations.

Reporting violations of the Code of Conduct is not optional. **You must report anything you see that may be unethical, illegal, or unprofessional**. Our reporting process includes several ways for you to share any concerns you may have.

The Reporting Process

1. Report to a supervisor. They are most familiar with the laws, regulations, and policies that relate to your work.
2. Report to a member of the leadership team or someone from Human Resources.
3. Contact your location's Compliance Liaison (Executive Director), a member of the Compliance Committee, or the Compliance Officer.
4. Call the toll-free compliance line which is available 24/7.
5. Scan the QR code which links to the compliance line portal.

You may always call the Compliance Line or file a report with Tim.Grimes@LEC.org.

Compliance Hotline – 800-211-2713.

All reports to the Compliance Line are confidential, and you may choose to report *ANONYMOUSLY*.

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. Our culture is to ensure that there is no retaliation for bringing issues forward.

That means you can make calls to the Compliance Line without fear of reprisal, retaliation, or punishment if your actions are made in good faith. Anyone, including a supervisor, who retaliates against an Associate or entity for contacting the Compliance Line or reporting a compliance issue in any other manner, will be disciplined.

Resident-Centered Care & Rights

Residents receiving healthcare and other services have clearly defined rights. To provide quality care and a high quality of life, we must honor those rights. This includes:

- Always treating residents equally and in respectful ways, preserving their dignity, autonomy, self-esteem, and civil rights.
- Protecting resident privacy and confidentiality, particularly with regard to medical, financial, or personal information as required by HIPAA.
- Respecting and protecting the personal property and money of all residents from loss, theft, improper use, and damage.
- Ensuring that residents and their legal representatives understand and participate in decisions about their care and treatment.
- Protecting every resident from physical, emotional, verbal, sexual or mental abuse or neglect. Any Associate who abuses or neglects a resident can be terminated. If you witness any form of abuse, you must report it immediately to your supervisor.

LEC will not tolerate any type of resident abuse or neglect at any time.

- Providing for the individual needs of our residents and developing care plans based upon their assessed needs.
- Monitoring to ensure that our residents receive quality services through Quality Assurance and Process Improvement (QAPI) efforts.
- Assuring that our staff is qualified with appropriate licenses and experience.

- Ensuring our policies, procedures, and practices are current and in line with the rules and laws we need to follow.
- Completing accurate and timely documentation and billing for services provided.

Professional Responsibilities

The professional, responsible, and ethical behavior of every Associate reflects on the reputation of our organization and the services we provide. Whether you work directly with residents or in other areas that support resident services, you are expected to maintain our values of respect, innovation, spirituality and excellence as you strive to make decisions that are honest and professional every day.

As an employer, we promise to follow **fair employment practices** when hiring, screening, and evaluating our associates. Federal, state, and local laws guide our employment practices and provide us with a roadmap to compliance.

To keep residents safe, we screen all Associates against various databases as required. As long as you work here, you must immediately tell your supervisor if any of your actions inside or outside of work might affect your employment. You must report any indictments, convictions, revocation of professional licenses, exclusions, or anything else that might prevent you from working at a healthcare organization.

If you are an Associate with a **professional license**, it is your responsibility to ensure you follow all applicable licensing, credentialing, and certification requirements and keep it current and in good standing.

We will not tolerate any form of **sexual harassment or violence** in the workplace. Additionally, Associates may not supervise or be supervised by anyone with whom they have a close personal relationship.

You must follow our **environmental safety protocols** which are here to protect you and the residents. This includes, but is not limited to, our emergency plans, hazardous materials, and environmental policies. Let your supervisor know of any potential hazards immediately.

We are committed to maintaining a workforce that is dedicated and capable of providing safe, high quality services to residents. **Safety in the workplace** includes refraining from using or consuming any substances that impair your ability to do your job. You must never

use, sell, or bring alcohol, illegal drugs, and/or narcotics on our property. You must never come to work under the influence of alcohol or drugs. We have the right to screen and discipline any Associate suspected of violating the drug and alcohol policy.

Governance & Oversight

During the course of your job, you may have access to confidential and proprietary information. **Proprietary information** is any information an organization creates or owns, such as policies and procedures, compensation rates, or marketing and advertising plans. Confidential or proprietary information should not be shared with anyone outside LEC without prior permission.

Associates must not accept any **tips, gratuity, or gifts** from residents, possible residents or their family. Associates must not enter into any financial transaction with a resident or a resident's family. Likewise, you must not give residents gifts or comingle your funds in any way (e.g. each put in half for a Powerball lottery ticket).

Gifts also include any **business or professional courtesy from vendors**, including travel and entertainment. Any business gratuity, whether goods or services, totaling more than $500 per year is a gift and should be disclosed to the Compliance Officer before accepting.

Associates must always avoid **conflicts of interest**. A conflict of interest is when your personal interests may interfere with your ability to make good decisions for LEC. Examples include you or a family member having a financial connection to a vendor who is in a position to influence your LEC decisions or taking a job outside of LEC that overlaps with your normal working hours or interferes with your job performance here. You or a family member working privately for a resident or their family is also a conflict of interest. If you are unsure if a situation or relationship is a conflict of interest, talk with your supervisor, Compliance Liaison or the Compliance Officer.

Throughout the course of your job, you may use our **computers, email, smart phones, software, computers, systems and networks**. You should have no expectation of privacy while using our equipment and systems and using them improperly or illegally is a violation of this Code of Conduct. When using your work computer to create documents, emails, medical records, billing records, and financial records, you must never falsify or alter any document in an illegal or unethical way.

We use **marketing and advertising** to educate the public, increase awareness about our services, and recruit new associates. All marketing and advertising materials are truthful and informative and are designed to be honest and accurate. We understand that Associates often have **relationships** with other healthcare providers and referral sources. All relationships with these professionals must be open, honest, and legal.

Because we are in healthcare, we must follow many federal, state, and local laws that govern our business, which are often subject to change. Keeping up with the most current **rules and regulations** is important. Management will communicate about these changes when they occur and educate Associates and others as needed. It is your job to read and pay attention to these updates**,** so you always have the most current information.

We are committed to **ethical and honest billing practices**. All Associates involved with billable information must make truthful, accurate, and complete statements and submissions for billing. We have zero tolerance for false or inaccurate coding or billing. Any team member who knowingly submits a false claim or provides information that could result in a false claim may be disciplined up to and including termination. Additionally, if you witness or suspect another Associate of making false billing claims, you must report the activity to your supervisor and/or the Compliance Officer.

We will take **disciplinary action** against Associates who violate this Code of Conduct, the Compliance and Ethics Program standards, the supporting policies and procedures, and applicable federal, state, and local laws. Disciplinary action could come in the form of termination of employment (or business relationship), civil penalties, and/or criminal investigation. We can also discipline any Associate who **retaliates** against another Associate for following the Code of Conduct and applicable laws.

This Code of Conduct and the Compliance and Ethics Program set standards for our legal, professional, and ethical conduct. As an Associate, your duty is to ensure that you are performing your responsibilities in every practical way to comply with these professional standards, the regulations guiding our business practices, and our policies and procedures.

Some key points to remember are:

- We are committed to personal and organizational integrity, acting in good faith, and being accountable for our actions.

- The Code of Conduct and the Compliance and Ethics Program prepare us to deal with the growing complexity of the ethical, professional, and legal requirements governing healthcare in the Continuing Care Retirement Community environment.
- The Compliance and Ethics Program is an ongoing effort designed to foster a supportive work environment, provide standards for clinical and business conduct, and offer education opportunities.

You are valued here! We trust you to always make ethical and honest decisions during your employment. If you ever have a question about compliance or ethics in your decision making, please discuss the issue with your supervisor or the Compliance Officer.

Tim Grimes

LEC Compliance Officer

Tim.Grimes@LEC.org

513-853-2094
