

United Church of Christ Homes

CODE OF CONDUCT

The Code of Conduct is not, and may not be construed as, a contract of employment or any other type of contract. Employment with UCC Homes at all times is “at will,” and either the employee or UCC Homes has the right to terminate the employment relationship at any time.

CODE OF CONDUCT NO. 1

UCC Homes’ employees and agents shall strive to deliver quality health care services that are necessary to attain or maintain each resident’s physical, psychosocial and mental well being.

- UCC Homes’ employees and agents shall respect a resident's dignity and will treat him or her with consideration, courtesy and respect.
- UCC Homes shall only employ or work with persons with proper credentials, experience and expertise. Employees and agents are expected to have those credentials and experience, and should expect other agents to have them.
- It is the job of each employee and agent to maintain UCC Homes’ integrity and reputation.
- Residents have the right to choose what is done to their body, and by whom. This includes the choice of health care providers.
- Residents have the right to know what they need to know to make intelligent decisions. That includes receiving information about UCC Homes, its charges, how to access its policies and procedures, and who will provide services on behalf of UCC Homes.
- UCC Homes’ employees and agents will provide each resident appropriate and sufficient treatment and services based upon an accurate comprehensive assessment and plan of care that addresses their clinical condition.
- UCC Homes will assure its employees and agents have required education, licenses, and supervision to render services to its residents.
- No deficiency or error should be ignored or covered up. A problem shall be brought to the attention of those who can properly assess and resolve the problem.
- Any incident of resident mistreatment, neglect or abuse will be reported to UCC Homes’ administrator and other officials as required by law.
- Employees and agents deserve clear instructions about what is expected of them.
- Our highest priority is health and safety. We shall strive to do our jobs so that no harm is caused to our residents, ourselves, or the public.

CODE OF CONDUCT NO. 2

UCC Homes’ employees and agents shall strive to assure that each resident is provided a dignified existence that promotes freedom of choice, self-determination and reasonable accommodation of individual needs.

- UCC Homes’ employees and agents will assure that each resident is protected from verbal, psychological, mental or physical abuse, corporal punishment and involuntary seclusion.

- UCC Homes' employees and agents will assure that residents are protected against the inappropriate use of physical or chemical restraints.
- UCC Homes' employees and agents will ensure that residents have personal privacy and access to their personal records.
- UCC Homes' employees and agents shall safeguard each resident's financial affairs to the extent UCCH has been entrusted.

CODE OF CONDUCT NO. 3

UCC Homes' employees and agents shall comply with all applicable laws and regulations that affect its various businesses.

- UCC Homes by and through its employees and agents shall comply with all applicable laws, regulations, standards and other requirements imposed by any level of government. Without limiting the generality of that statement, UCC Homes' employees and agents shall comply with all requirements of the Medicare and Medicaid programs.
- UCC Homes' employees and agents will not pursue any business opportunity that requires engaging in unethical or illegal activity.
- Neither UCC Homes, its employees or agents shall pay employees, physicians, or other health care professionals, directly or indirectly, in cash or by any other means, for referrals of residents. Every payment to a referral source must also be supported by proper documentation that the services contracted for were in fact provided.
- No employee or agent is authorized to enter into any joint venture, partnership or other risk sharing arrangement with any entity that is a potential or actual referral source unless the arrangement has been reviewed and approved by UCC Homes' lawyers.
- Employees or agents who perform billing and/or coding of claims must take every reasonable precaution to ensure that their work is accurate, timely, and in compliance with federal and state laws and regulations and UCC Homes' policies.
- No claims for payment or reimbursement of any kind that are false, fraudulent, inaccurate or fictitious may be submitted. No falsification of medical, time or other records that are used for the basis of submitting claims will be tolerated.
- UCC Homes will bill only for services that are medically indicated, ordered by the resident's physician, actually rendered and which are fully documented. If the services must be coded, then only billing codes that accurately describe the services provided will be used.
- UCC Homes' employees and agents will only submit claims for covered items and services.
- UCC Homes shall act promptly to investigate and correct the problem if errors in claims that have been submitted are discovered.
- UCC Homes shall maintain complete and thorough medical and billing records.
- UCC Homes' employees and agents shall respect and protect the confidentiality of resident records and other personal information.
- All drugs or other controlled substances shall be maintained, dispensed and transported in conformance with all applicable laws and regulations.

- Employees and agents shall promptly report all suspected violations of the Code of Conduct, Compliance Policies, operational policies, laws or regulations.

CODE OF CONDUCT NO. 4

UCC Homes' employees and agents shall engage in ethical business relationships.

- UCC Homes seeks positive relationships with government programs and third party payers. Positive relationships require ongoing communication about resident progress and billing.
- Employees or agents shall not use or reveal any confidential information concerning UCC Homes. Neither shall they use, for personal gain, confidential information obtained as an employee or agent of UCC Homes.
- No employee or agent should subordinate his or her professional standards, judgment or objectivity to any individual. If significant differences of opinion in professional judgment occur, then they should be referred to management for resolution.
- Employees and agents should be honest and forthright in any representations made to residents, vendors, payers, the community, and other employees or agents.
- All reports or other information required to be provided to any federal, state or local government agency shall be accurate, complete, and filed timely.
- Employees and agents must perform their duties in a way that promotes the public's trust in UCC Homes.
- The source or amount of payment does not determine the quality of care residents receive.
- Employees and agents shall be honest in doing their jobs.
- If an employee or agent knows of or suspects a practice or incident that may violate this Code of Conduct, UCC Homes' Compliance Policies, operational policies, any law or regulation, then he or she must report it to appropriate levels of management or the Corporate Compliance Administrator.

CODE OF CONDUCT NO. 5

UCC Homes' employees and agents shall avoid either conflicts of interest or the appearance of an impropriety.

- Employees and agents shall not have other jobs that interfere with their ability to perform their duties at UCC Homes.
- Employees and agents shall avoid any activity that conflicts with the interests of UCC Homes or its residents. They should try to avoid even the appearance of an impropriety. If an employee or agent suspects that a conflict may exist or be created, then he or she should consult with management.
- Placing business with any firm in which there is a family relationship may constitute a conflict of interest. Advance disclosure and approval are required in such a situation.
- Employees and agents shall not become involved, directly or indirectly, in outside commercial activities that could improperly influence their actions. For example, an employee or agent should not be an officer, director, manager or consultant of a potential competitor, customer, or supplier of UCC Homes without first disclosing that relationship to the administrator or program director.

- Employees and agents shall not accept or provide benefits that could be seen as creating conflict between their personal interests and UCC Homes' legitimate business interests. This includes accepting expensive meals, gifts, money, property, valuables, transportation, or entertainment provided or received in connection with the job.
- Gifts and benefits to clinicians or referral sources are not appropriate. Occasional non-cash gifts are limited to reasonable meal expenditures or entertainment of a nominal value, although not expressly prohibited, are discouraged.
- Employees and agents shall report any potential conflicts of interest concerning themselves or their family members to management.

CODE OF CONDUCT NO. 6

UCC Homes' employees and agents shall protect UCC Homes' property, and respect the property rights of others with whom we do business.

- All employees and agents are personally responsible and accountable for the proper expenditure of UCC Homes funds and for the proper use of company property.
- All employees and agents must obtain authorization prior to committing or spending UCC Homes' funds.
- Employees and agents may not use UCC Homes' or a resident's resources for personal or improper purposes, or permit others to do so.
- Surplus, obsolete or discarded property shall be disposed of in accordance with UCC Homes' procedures. Unauthorized disposal of property is a misuse of assets.
- Employees and agents have a duty to be productive during the hours of work that are paid by UCC Homes.
- Employees and agents may only use computer systems, networks, and software consistent with UCC Homes' license(s) and/or rights. They shall take all reasonable steps to protect computer systems, data, and software from unauthorized access or intrusion.
- UCC Homes' confidential and proprietary information is valuable, and should be protected from unauthorized use or exploitation. Employees and agents are expected to respect the intellectual property rights of UCC Homes as well as others with whom we do business.
- Any improper financial gain to the employee through misconduct involving misuse of UCC Homes' or a resident's, visitor's or other employee's property is prohibited, including the outright theft of property or embezzlement or borrowing of money.
- Employees and agents shall report any observed misuse of UCC Homes' or a resident's, visitor's or employee's property to management or the Corporate Compliance Administrator.
- Drugs and other pharmaceuticals shall be safely stored, secured, inventoried, and missing supplies shall be reported promptly to supervisors.
- Medical waste or other hazardous materials shall be disposed of in accordance with UCC Homes policies and current regulations.

CODE OF CONDUCT NO. 7

UCC Homes' employees and agents respect each other as human beings and health care professionals.

- All employees and agents shall show proper respect and consideration for each other, regardless of position or station. Discriminatory treatment, harassment, abuse, workplace violence, or intimidation will not be tolerated.
- As defined further in its policies, UCC Homes strives to maintain a working environment free from all forms of sexual harassment or intimidation. By way of example, unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature are serious violations of the standards of conduct and will not be condoned or permitted.
- Quality resident care can only be delivered through the use of qualified, competent staff. UCC Homes will contribute to an employee's competence by making available continuing job-related education through inservice training.
- Applicants and employees shall be afforded equal employment and advancement opportunities, pursuant to UCC Homes' policies.
- Employees and agents are expected to conform to the standards of their respective professions and exercise sound judgment in the performance of their duties. Any differences of opinion in professional judgment should be referred to appropriate management levels for resolution in accordance with the problem solving policy.
- Work and safety rules have been created to protect us all. Employees and agents are expected to comply with rules established by and in compliance with UCC Homes policies and procedures.
- UCC Homes promotes a drug, alcohol, and smoke free workplace in accordance with its policies.
- UCC Homes shall not permit any action of retaliation or reprisal to be taken against an employee who reports a violation of law, regulation, standard, procedure, or policy.