



CODE OF CONDUCT

LANDIS COMMUNITIES

Code of Conduct

Landis Communities is a 501(c)(3) organization, classified as a Human Services - Multipurpose and Other organization. Landis Communities is a holding company that serves as the supporting organization for the following entities:

- Landis Homes
- Landis Home and Community Based Services (HCBS), which operates Landis at Home, Landis Adult Day Services and Pathways Institute for Lifelong Learning. It also functions as a partner organization to Friends LifeCare and Lancaster Downtowners.
- Landis Quality Living, which operates Landis Place on King and Quality Living Choices (Steeple View Lofts)
- Welsh Mountain Home, which operates Mountain View Terrace

The following services are provided by one or more of the Landis Communities affiliates:

- Skilled Nursing
- Personal Care
- Residential Living (CCRC, market rate and affordable options)
- Adult Day Services
- In-home Services

As a part of our 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. Organizations 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 as a team. We can ensure that we provide the highest level of care and services and prevent fraud, waste, and abuse.

Our Compliance Officer is Karla Dreisbach. The Compliance Official at Landis Communities is Melinda-Ann Miller.

From the President & CEO

Dear Team Members:

We have a long tradition of providing services to older adults in a way that demonstrates Landis Communities' commitment to Christian love and compassion. We strive to follow our faith-based heritage of ethical and moral decision making in the care we provide. This heritage enables us to share our values with the residents, clients and families we serve.

The healthcare industry is constantly changing and being impacted by numerous laws and regulations. It is our desire to establish a workplace that complies with these laws and regulations. As part of this effort, we have developed a Compliance and Ethics Program that supports Landis Communities team members in making the right decisions. This document, called the Landis Communities Code of Conduct, represents the primary focus for our Compliance and Ethics Program. The Code of Conduct not only reflects our heritage and values but also serves as a bold statement influencing how we enhance residents and client's quality of life.

The Compliance and Ethics Program and the Code of Conduct exist to guide our normal decisions that are both ethical as well as compliant with applicable laws, statutes, and regulations. Our Code of Conduct does not replace each person's obligation in making wise, fair, and honest decisions. It is intended to explain our personal and organizational responsibility and to reflect those areas in which improper or unwise decisions can harm our entire organization and impair our commitment to those we serve.

We value your contribution to the residents and appreciate your support in properly maintaining the most ethical workplace possible. We commend you for your commitment to honesty and integrity, which are also part of Landis Communities' values. Each team member is responsible for helping to protect our work environment and its compliance with laws and regulations. I thank you for your commitment and contribution to our mission, values and, most importantly, to our residents.

Sincerely,

Larry Zook

President/CEO, Landis Communities

Mission

Following God's Call to creatively serve the diverse needs and interests of older adults by developing opportunities and collaborative relationships.

Vision

Enriching Lives

Guiding Values

We commit to these values as we honor God in our service to others.

Joy

Nurturing an atmosphere which is positive, hopeful and thankful, while delighting in serving others, fulfilling responsibilities and celebrating life.

Compassion

Demonstrating Christ-like love and concern in our relationships, serving one another with grace, humility, gentleness and sensitivity in a manner which respects diversity and honors the dignity and worth of everyone.

Integrity

Committing ourselves to be honest, sincere, trustworthy and accountable in relationships, communication and decision-making, with a respect for confidentiality. **Stewardship**

Devoting ourselves to faithful and responsible use of resources entrusted to our care, upholding high standards of performance and quality, striving for excellence and serving beyond expectations.

Community

Relating with a spirit which is characterized by cooperation, teamwork, encouragement and mutual respect, valuing each person, affirming gifts and abilities, and seeking improvement through learning, creativity and openness to change.

Introduction

Our **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(s) or how to respond to a situation. Employees and individuals all share a commitment to legal, ethical, and professional conduct in the workplace. This Code of Conduct is one of three documents that guide our work. For more detailed information, you can read the **Compliance Plan** and the **Compliance Policies and Procedures**. The Compliance Plan and Code of Conduct include the federal, state, and local laws we must follow.

Our Responsibilities

As part of our team, we each share a responsibility and commitment to our residents, their families and each other.

As part of your commitment to our team, it's important that you always make legal and ethical decisions. Additionally, if you see anyone else on the team violating the Code of Conduct, it's your responsibility to report those violations to the compliance officer. 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 identify.

The Reporting Process

You may always call the Compliance Line at 800-211-2713 or file a report to Melinda Miller, Director of Compliance, Risk Management, & Quality at 717-381-3573 or mmiller3@landis.org.

- Report to a supervisor. They are most familiar with the laws, regulations, and policies that relate to your work.
- Report to a member of the leadership team, seeking out another or someone from human resources.
- Contact the Compliance Official, a member of the Compliance Committee, or the Compliance Officer.
- Call the toll-free compliance line which is available 24/7.
- Scan the QR code which links to the compliance line portal.

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.

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

Resident-Centered Care & Rights

The **foundation for good quality of care and quality of life** is understanding and honoring resident rights. As we provide care, it is important to respect residents' 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 team member who abuses or neglects a resident can be terminated.

If you witness any form of abuse, you must report it immediately to your supervisor.

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

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

Professional Responsibilities

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

To keep residents safe, we screen all employees against various databases as required by law. 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 arrests or indictments, convictions, revocation of professional licenses, exclusions, or anything else that might prevent you from working at a healthcare organization.

The professional, responsible, and ethical behavior of every team member reflects directly on our reputation. As a team member, you must strive to make decisions that are honest and professional every day.

If you are a team member with a **professional license**, it's 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, team members may not supervise or be supervised by anyone with whom they have a close personal relationship.

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

Safety in the workplace includes refraining from using any substances that impair your ability to do your job. You may never use, sell, or bring alcohol, illegal drugs, and/or narcotics on our property. You may never come to work under the influence of alcohol or illegal drugs. We have the right to screen and discipline any employee suspected of violating the drug and alcohol policy.

Governance & Oversight

We are committed to ensuring our organization remains in **compliance** with all applicable federal and state laws. As a team member, you must also help our organization always remain in good standing with regard to our business practices.

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, or marketing and advertising plans. Confidential or proprietary information should not be shared with anyone outside Landis Communities without prior permission.

Special relationships are readily developed as we serve residents, clients and their families. Consequently, they may wish to give you a gift expressing their appreciation. However, they are encouraged to show their gratitude through spoken and written words of appreciation rather than through personal gifts. Soliciting (asking/requesting) gifts of any kind should never happen.

As a matter of ethical conduct, team members generally may not accept tips, gratuities or gifts from residents, clients or families. Cash, cash equivalents and personal property of the resident/client should not be accepted. If the person insists on giving

a gift of appreciation, they can be referred to the department director/supervisor. The resident, client, family member and/or other responsible party may need to be consulted in order to protect the interests of all parties.

Acceptance of holiday gifts, and the like, such as cookies/candy will be acceptable, but this practice is not to be expected nor encouraged. Consult with Human Resources whenever there is a question and to help insure consistent application of the policy.

Additional Interpretation of the Policy:

Team members may accept the following types of “holiday/special gifts” but should not solicit:

- Cards
- Perishable or consumable items, e.g. candy, chocolate
- Items that are not the resident or client’s personal property and have a value under twenty-five-dollars (for example – body wash, lotion).
- Gifts to an entire team (e.g. a household or department) can be received by the director/supervisor and then used for the benefit of the team.
- Modest gifts (more or less fit within the guidelines above) that are for “Life Celebration Events”, e.g. wedding gift, birth of a child. (May 21, 2009).

Associates may not accept any tip or gratuity from residents and clients; neither may they receive gifts from nor give gifts to residents and clients; nor may they borrow money from nor lend money to residents or clients; nor may they engage with residents or clients in the purchase or sale of any item.

Beneficiary and Power of Attorney

Associates may not accept any gift from a resident or client under a will or trust instrument except in those cases where the associate and resident or client are related by blood or marriage.

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

Business Courtesies

Landis Communities prohibits a team member from offering, giving, soliciting, or accepting unreasonable business or professional courtesies including entertainment and gifts that could be interpreted as attempts to influence decision making.

In general, a business or professional courtesy is unreasonable if:

- It may appear to corrupt or influence the judgment of the recipient or to secure preferential treatment; or
- Public disclosure of the gift would be embarrassing to Landis Communities and/or the giver.
- Team members may accept invitations to social events in order to further develop business relationships, provided that the associated costs are reasonable and appropriate. Travel and overnight lodging costs or costs for a family member may not be accepted.
- Generally, a team member can accept non-cash gifts with a total value of \$50 or less in any year from a business associate or organization. However, business courtesies, regardless of value, that could influence or appear to influence an employees in the conduct of their duties must be declined.
- Perishable or consumable gifts given to a department or group may exceed a total value of \$50 if it of modest value.
- Under no circumstances will a team member solicit or accept business courtesies, entertainment or gifts that depart from the Business Courtesies policy.

Team members 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 Landis Communities. If you are unsure if a situation or relationship is a conflict of interest, talk with your supervisor.

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

We use **marketing and advertising** to educate the public about our community services, activities, and opportunities. All marketing and advertising materials are truthful and informative and are designed to be honest and accurate. Team members and individuals often have **relationships** with other healthcare providers and referral sources. All relationships with these professionals must be open, honest, and legal.

We are required to follow many federal, state, and local laws, often subject to change. Management will communicate about these changes when they occur and educate employees and individuals as needed. It's your job to read these **updates**, so you always have the most up-to-date information.

We are committed to **ethical and honest billing practices**. All team members 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 include termination. Additionally, if you witness or suspect another employee or individual member of making false billing claims, you must report the activity to your supervisor or the compliance officer/designee.

We will take **disciplinary action** against a team member who violates this Code of Conduct, the Compliance and Ethics Program, 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 relationships, civil penalties, and/or criminal investigation. We may also initiate disciplinary action against any employee who **retaliates** against another employee following the Code of Conduct and applicable laws.

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

The Compliance and Ethics Program is critical to our continued success. The Code of Conduct and the Compliance and Ethics Program set standards for our legal, professional, and ethical conduct. 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 environments.
- The Compliance and Ethics Program is an ongoing initiative designed to foster a supportive work environment, provide standards for clinical and business conduct, and offer education and training opportunities for team members.

The success of the Compliance Program depends on our commitment to act with integrity, both personally and as an organization. As a team member, your duty is to ensure that you are doing everything practically to comply with applicable laws. 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.

Your Compliance Official
Melinda-Ann Miller, LSW,
PCHA, NHA, CPASRM
Landis Communities
717-381-3573

Your Compliance Officer
Karla Dreisbach, CHC, CHPC, CCEP
AQORD Compliance Collaborative
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