

# Regulatory Excellence

We are obligated to follow federal, state, and local laws that govern our business. We are responsible for staying current to perform our job duties, including:

- Honest, ethical billing and communications;
- Avoiding kickbacks for referrals;
- Avoiding inducements;
- Respecting copyright laws;
- Operating with standards of financial practices and controls;
- Dealing fairly with all we come in contact with;
- Documenting accurately and timely
- Voluntarily disclosing when we find we are out of compliance;
- Cooperating with government investigations.

Disciplinary action will be taken against any Team Member who fails to act in accordance with the Code of Conduct, the compliance and ethics program, supporting policies and procedures and applicable federal and state laws.

Your personal and professional  
**INTEGRITY = OUR SUCCESS**

## A PERSONAL OBLIGATION

You have a duty to report any problems you observe or perceive, regardless of your role.

### FOLLOW THESE STEPS:

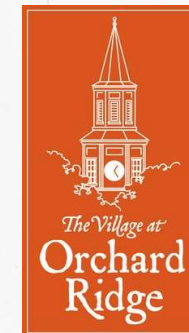
- 1** Talk to your supervisor.
- 2** If you are unable to talk to your supervisor, seek out another member of management or Human Resources.
- 3** If you still have a concern, contact the Compliance Official or a member of the Compliance Committee.
- 4** Finally, call the **COMPLIANCE HOTLINE** 800-211-2713  
Confidential and Anonymous

Therese Provencher  
Corporate Compliance Officer  
National Lutheran Communities & Services  
5275 Westview Drive, Suite 110  
P: 240-252-2898  
Email: [tprovencher@nationallutheran.org](mailto:tprovencher@nationallutheran.org)



National Lutheran  
Communities & Services

# CODE OF CONDUCT



5275 Westview Drive,  
Suite 110  
Frederick, MD 21703

# Code of Conduct

National Lutheran Communities and Services is a Continuing Care Retirement Community.

Our compliance and ethics program covers the compliance issues, laws, regulations and guidelines relevant to a provider of senior services including residential, assisted living/personal care and skilled nursing services.

Our Code of Conduct is a shared responsibility that applies to every person at our organization. This includes all Team Members: employees, the board of directors, volunteers, independent contractors, subcontractors and vendors.

Our Code of Conduct is supported and guided by policies and procedures. Any questions can be directed to your immediate supervisor, the Compliance Official, or any member of the Compliance Committee.

For a copy of the entire Code of Conduct, please visit [www.nationallutheran.org/corporate-compliance](http://www.nationallutheran.org/corporate-compliance) or contact:  
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# Care Excellence

Our most important job is providing quality care to our residents. This means offering compassionate support and working toward the best possible outcomes while following all applicable rules and regulations, including:

- Honoring Resident Rights;
- Zero tolerance for Abuse and Neglect. *Any Associate who abuses or neglects a resident is subject to termination and legal and criminal action. Abuse and neglect are to be reported to your supervisor immediately.*
- Maintaining confidentiality of all resident information;
- Respecting and protecting resident property to prevent loss, theft, damage and misuse;
- Providing Quality Care;
- Conducting accurate assessments and care plans;
- Providing only medically needed services;
- Using current practice standards;
- Completing accurate, timely documentation;
- Measuring clinical outcomes;
- Assuring our workforce has appropriate experience and expertise to provide services;
- Implementing Quality Assurance Performance Improvement programs to improve outcomes;
- Committing to comprehensive medically needed services. The Medical Director will have oversight of physicians and other medical services.

# Professional Excellence

The professional, responsible and ethical behavior of every Team Member reflects on the reputation of our organization and the services we provide. Whether you work directly with residents or in other areas, you are expected to maintain standards of honesty, integrity and professional excellence every day.

## THIS INCLUDES:

- Hiring the best qualified employees/ Team Members regardless of race, color, age, religion, national origin, gender identity, sexual orientation or disability;
- Completing employee/Team Member screening;
- Making the workplace a safe, ethical and comfortable environment, including a workplace free of substance abuse;
- Assuring company privacy and assuring proprietary information is kept confidential;
- Following the Business Courtesies and Resident Gifts policies;
- Reporting any actual or potential conflict of interests;
- Using property appropriately and respecting property and copyright laws;
- Ensuring appropriate use of computers which eliminates improper, unlawful activity, downloads or use of games on our community's computers;
- Being responsible for honest and ethical vendor relations;
- Assuring truth in our marketing and advertising.