



LIFE CARE CENTERS OF AMERICA

LOCA

CODE OF CONDUCT

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LIFE CARE'S MISSION AND VALUES

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MISSION

To be a premier provider and the facility of choice for long-term care residents and post-acute patients in every community we serve.

VALUES



Clinical Quality

We provide our residents and patients with the necessary care and services to support their highest practical physical, mental, and social well-being.



Integrity

We are dedicated to integrity in everything we do, to always act ethically, and to comply with applicable laws and regulations.



Service Excellence

We provide excellent customer service and are a valuable partner to healthcare providers in the communities we serve.



Stewardship

We use our financial and human resources responsibly to serve our residents, patients, and ownership.



Teamwork

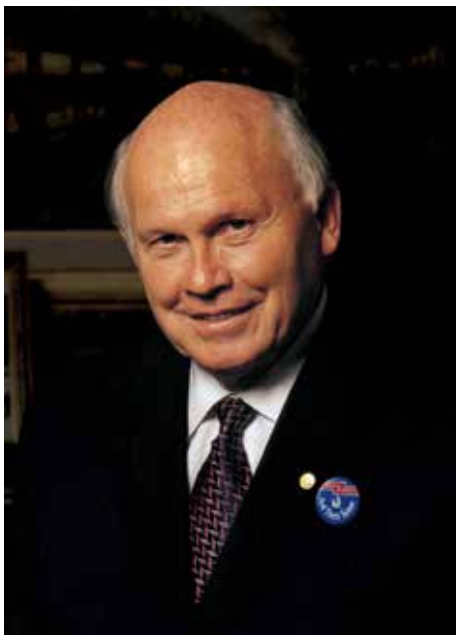
We work together to excel in everything we do and to treat each other with loyalty, respect, fairness, and dignity at all times.



Commitment

We are committed to the Judeo-Christian ethic and the principle that obedience to God is best measured by service to others.

MESSAGE FROM OUR FOUNDER AND CHAIRMAN



Dear Associate:

Those of us who work in healthcare quickly discover the joy and the blessings of serving others, particularly those who are vulnerable because of illness, post-acute care requirements, or the challenges of advancing age. In the process, an extraordinary bond of trust and appreciation develops between the caregiver and the recipient.

Our calling is a true ministry – serving God by serving others. And it demands the very best we have to offer, applying our professional talents in a spirit of love and compassion, and performing as an integral member of a highly functioning team.

Our service must be founded on indisputable integrity – committing to doing the right thing, asking questions when necessary, speaking up when witnessing behavior that does not seem appropriate, and always acting in accordance with our Mission and Values, this Code of Conduct and other related standards. We cannot achieve the results that our residents and patients need and deserve without your dedication, ethical behavior, and hard work.

Thank you for your important role in building Life Care's reputation for service excellence one resident, one patient at a time.

A handwritten signature in black ink that reads "Forrest L. Preston". The signature is written in a cursive, flowing style.

Forrest L. Preston
Founder & Chairman



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OUR COMMITMENT TO INTEGRITY

Our Code of Conduct (Code) is our pledge to serve those who depend on Life Care Centers of America.¹ It is our promise to honor this commitment to integrity through quality care, service excellence, responsible stewardship, and respectful teamwork. The Code lays out the ethical and legal standards that help us live up to our values and do what is right.

HOW TO USE OUR CODE

Our Code is designed to be a resource when you need information about our policies or standards, or when you are dealing with a difficult ethics or compliance situation. For easy access, it is available as a booklet and posted to the Company’s intranet site.

It is impossible to anticipate every question or situation that may arise, so in addition to the Code, Life Care also has other resources that can help. These additional resources are referenced throughout the Code and listed at the end. Remember – Life Care puts its faith in you to use good judgment and if you need help, to always ask before you act.

If you need additional guidance from your supervisor

or another Life Care resource before making a decision, please utilize one of the resources listed on page 35.

WHO MUST FOLLOW OUR CODE?

Everyone who works for Life Care, or on its behalf, must follow our Code. It applies to all of Life Care’s directors, officers, associates, and others acting on behalf of Life Care such as vendors, contractors, medical directors, attending physicians, and healthcare professionals providing services to our residents and patients.



SPOTLIGHT Compliance mandate

Compliance with the Code is non-negotiable and a condition of employment at, and doing business with, Life Care.

ASSOCIATE RESPONSIBILITIES

Doing *Whatever It Takes, And Then Some* is a shared responsibility among all Life Care associates. To meet this commitment:

- **Always act with integrity.** Be professional, respectful, and ethical when acting on behalf of Life Care.
- **Know the standards and apply them.** This includes

¹To avoid any confusion with respect to this publication, various entities Life Care Centers of America, Inc., Life Care Physician Services, LLC, and their affiliates, will be collectively referred to as “Life Care” or the “Company.”

the guidance in the Code, policies and applicable laws, and professional standards. Live by both the letter and the spirit of these standards every day. Never feel forced to violate our principles. If you ever feel such pressure or have any questions, consult with your supervisor or another Life Care resource.

- **Be familiar with the law and ask questions.** You do not have to be a legal expert, but you should be aware of the basic laws and regulations that affect your specific job and level of responsibility. Ask questions, if needed.

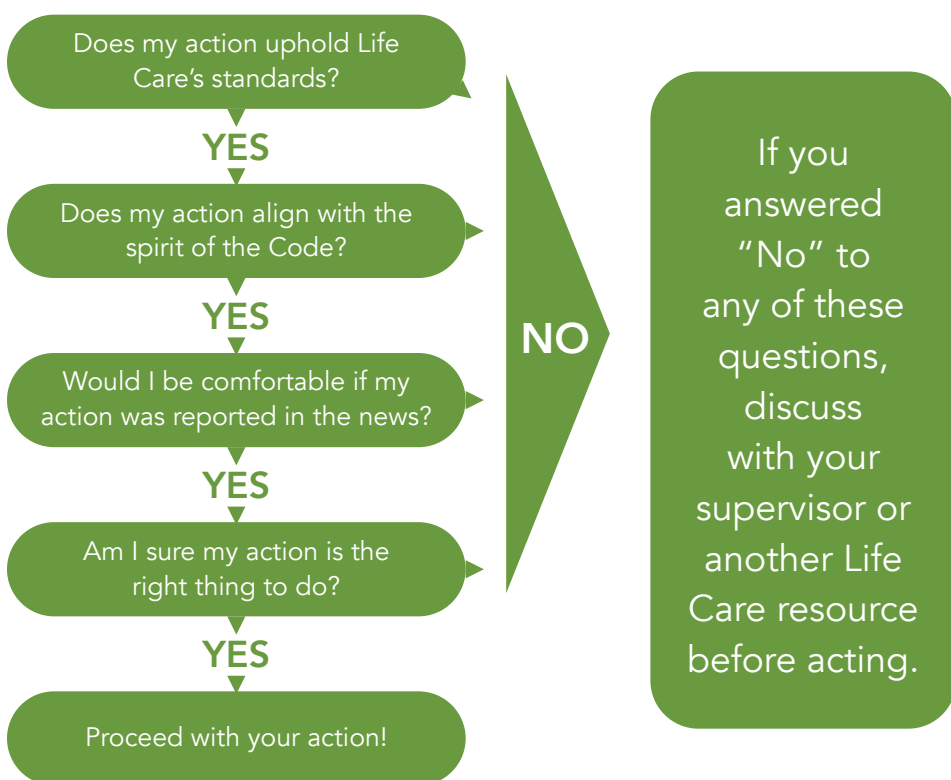
- **Complete all required training in a timely way.** Keep up-to-date on current standards and guidance, and ask questions about anything you do not understand.
- **Be an involved member of the Life Care team.** Be quick to offer suggestions on how to improve processes, and on making policies and procedures easier to understand.
- **Cooperate with audits and investigations.** Be honest and truthful when responding to questions from auditors and investigators. Never destroy or alter records during, or in anticipation of, an audit or investigation.

- **Report concerns of possible misconduct.** If you know or suspect a violation of law, regulations, or policy has occurred, or if you are concerned about the ethics or compliance implications of a situation, talk to your supervisor or another Life Care resource. Never assume that management already knows or does not care about an issue. Always speak up if you have concerns.



MAKING THE RIGHT CHOICE

Making good, ethical decisions is not always easy or clear. Legal standards and care situations can be complex. When you are faced with a tough ethical decision, it may help to ask the following questions.



WHAT IT MEANS

Good faith reporting

Reporting in **good faith** means the person raising the issue believes that he or she is providing complete and truthful information about the matter.

ADDITIONAL RESPONSIBILITIES OF LEADERSHIP

Supervisors and managers have additional responsibilities.

- **Be instructive.** Distribute the Code to new associates and others as required by Life Care's policy. Ensure that they understand the standards outlined in the Code and our policies.
- **Be proactive.** Ensure that associates are properly trained and understand their responsibilities. Be clear that you expect them to always comply with the law, the Code, and other applicable standards.
- **Be receptive.** Maintain an open-door policy. Make it known that you are open and available to address questions or concerns about ethics or compliance-related issues.
- **Be responsive.** If someone tells you about potential misconduct, take prompt and appropriate action. If you are not sure what to do, seek assistance from your supervisor, senior leadership, or other resources such as the Legal and Risk Services or Compliance department.
- **Do not ask others to do what is prohibited.** Never ask, pressure, or expect an associate or others to violate laws, regulations, the Code, or Life Care policies.

- **Do not retaliate or tolerate it from others.** Anyone who makes a good faith report of a suspected violation of law or policy or who cooperates with an audit or investigation must not suffer retaliation for doing so.

RAISING QUESTIONS AND CONCERNS

If you see or suspect any violations of law, regulation, the Code, or other Life Care standards, or you have a question about what to do, promptly talk to your supervisor or another available Life Care resource (see Life Care Resources list on page 35 and find policies and procedures on Village Square, Life Care's intranet). When all associates fulfill this requirement to raise concerns in a timely way, we demonstrate our commitment

to moral, ethical, and legal conduct.

OUR NON-RETALIATION POLICY

Retaliation undermines our values and can hinder our ability to deliver excellent service to those in our care. Life Care is committed to protecting you from retaliation if you report concerns in good faith or cooperate with an investigation or audit. If you experience conduct you feel is retaliation for reporting or assisting in the investigation of a good faith report, promptly notify the Compliance department so it can be addressed.



SPOTLIGHT:

Examples of General Workplace Issues

- Harassment
- Discrimination
- Suspected use of alcohol or illegal drugs in the workplace, including misuse of prescription drugs
- Personal problems between you and a coworker
- Wage, hour, and schedule issues

Examples of Compliance and Ethics Issues

- Inaccurate coding or billing
- Retaliation for reporting a concern or cooperating in an investigation
- False or inaccurate claims submitted to Medicare, Medicaid, or other payors
- Suspected violation of law, regulations, the Code, policies, or procedures

INVESTIGATIONS AND CONFIDENTIALITY

- **Confidentiality.** All information shared with any resource or reporting channel will be treated confidentially to the extent allowed by law, and shared only on a need-to-know basis (e.g., with the investigator) to address the issue.
- **Investigations.** When an investigation is necessary, it will be conducted by the Compliance department, the Human Resources department, or other appropriate internal or external resources. Some types of misconduct must be reported by law to external authorities.
- **Your responsibility.** Cooperate fully with any investigation or audit. Be

forthcoming and truthful when talking with an investigator or auditor. Never alter or destroy records in anticipation of, or response to, an investigation or audit.

Sometimes the Legal and Risk Services department will issue a “hold” on internal documents. Additionally, records that are related, yet not part of the hold, must also be preserved until the conclusion of the query.

ACCOUNTABILITY AND CORRECTIVE ACTION

Violation of the laws, regulations, the Code, and other standards can cause legal and financial liability for Life Care and you. It also may result in harm to our residents, patients, and reputation. Consequently, you must report any actual or suspected

ethics or compliance concern that comes to your attention. Anyone found responsible for such misconduct will be disciplined according to the nature of the violation, up to and including, termination of employment and, in some cases, be subject to legal penalties and prosecution.

WAIVERS AND EXCEPTIONS

Life Care periodically reviews the Code and recommends changes for approval by its Board of Directors. In very rare situations, the Company may determine it is appropriate to waive a provision of the Code. All such waivers must be granted only by the Board or Chief Compliance Officer and documented.





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QUALITY CARE

Our Commitment

We provide our residents and patients with the care and services necessary to experience the highest physical, mental, and psychosocial well-being they individually can achieve. Our teamwork and dedication to this principle creates the highest quality of care.

What to Know

Great quality care has many components, including focused effort to:

- Provide quality services to all persons who require them without regard to race, color, national origin, sex, gender identity, sexual orientation, age, or disability;
- Treat all residents, patients, and their families with

respect and dignity at all times;

- Provide appropriate and qualified staffing;
- Protect resident and patient privacy and maintain appropriate records;
- Ensure appropriate care tailored to meet the residents' and patients' clinical needs;
- Educate residents, patients, and/or their families concerning care provided, and involve them in all details or aspects of their care; and
- Ensure resident and patient safety.

What to Do

- **Know the standards.** Read and thoroughly understand the policies and standards

HOW TO LIVE IT

Q

One of our residents fell prior to coming to our facility. She often gets up and wanders during the night. I worry that she will fall and hurt herself. How can I help her?

This is a safety concern and should be reported to the charge nurse so the interdisciplinary team can put appropriate interventions into place and care plan for this resident. The reason for the wandering should be addressed. It is important to get the interdisciplinary team, physician, and family involved to determine the appropriate plan of care.

A

Q

Why do we need to use two resident or patient identifiers when providing care and services?

Misidentifying a resident or patient is a safety issue. When care is being provided, associates must be able to identify the resident or patient for whom the services or treatment is intended and be able to match it to that individual. For example, the facility must have two resident or patient identifiers when collecting blood samples and specimens, providing treatment, and administering medications.

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that relate to your role or level of caregiving. Complete related training. Seek help from your supervisor to understand anything that is not clear.

- **Be vigilant.** Recognize and report those practices and situations that could be improved to prevent lapses in care quality or patient safety.
- **Speak up.** Immediately report issues related to quality care or resident or patient safety that could be or have been jeopardized. Bring your concerns to the attention of your supervisor or another Life Care resource. This is so critical that it is a condition of continuing employment.

WHERE TO FIND MORE

- Clinical Services Manual
- Omnicare LTC Facility Pharmacy Services and Procedure Manual
- Pharm America Nursing Care Center Pharmacy Manual



RESIDENT AND PATIENT RIGHTS

Our Commitment

We are devoted to the preservation of dignity, self-respect, and resident and patient rights in a loving and caring environment. It is Life Care's policy that all residents and patients in its nursing facilities have, among other rights, the right to a dignified existence, self-determination, and communication with, and access to, people and services both inside and outside the facility. We are committed to ensuring that each resident and patient is aware of his or her rights.

What to Know

- Life Care will not tolerate any type of abuse or neglect.
- We will not deny access to care based on any personal characteristic protected by law or our policies.
- Anyone who abuses or neglects a resident or patient



SPOTLIGHT: Elder Justice Act

Everyone who works on behalf of Life Care is required by law to report any *reasonable suspicion* of a crime committed against any person who is a resident or patient of, or is receiving care from, a Life Care facility. The report must be made to specific law enforcement agencies and to the applicable state survey agency. Timing is critical. Make the report within 2 hours of forming a reasonable suspicion that a crime has occurred if there is a serious bodily injury. Report within 24 hours of forming a reasonable suspicion if there is no serious bodily injury.

will be reported to the appropriate state agencies and may be the subject of legal and/or criminal actions, and will be subject to dismissal if he or she is an associate or working on Life Care's behalf.

What to Do

- **Treat residents and patients with dignity and respect.**



SPOTLIGHT: Where to Report Abuse and Neglect



Per federal regulations, a facility must ensure that all alleged violations involving abuse, neglect, exploitation, or mistreatment, including injuries of unknown source and misappropriation of resident property, are reported to the State Survey Agency and other officials such as Adult Protective Services, when applicable. Reporting must occur no later than 2 hours after the allegation is made.

A resident or patient with behavioral issues or an associate with an unusually busy shift are no reasons to treat a resident or patient poorly. You must treat all residents and patients as you

would want your own beloved family member to be treated **all of the time.**

- **Communicate appropriately.** Speak with residents and patients in a way they can understand. Encourage questions and seek help when you encounter language or other communication barriers.
- **Invite involvement.** Help residents and patients understand their rights and get them involved in determining appropriate aspects of their care.
- **Protect residents and patients.** Ensure that residents and patients are protected to the extent possible. Prevent and refrain from physical, mental, sexual, or verbal abuse as well as

neglect, misappropriation (theft), and exploitation. These may come from not only fellow associates, but also from other residents, patients, volunteers, agency staff, family members, visitors, legal guardians, friends, or any other persons.

- **Speak Up.** If you become aware of or suspect abuse, misappropriation (theft), or exploitation related to a resident or patient, you must report it immediately to your supervisor or another supervisor in your chain of command.



WHERE TO FIND MORE

• Clinical Services Manual

HOW TO LIVE IT

Q We have a resident whose daughter makes all the decisions for her father. He is quite alert and capable of being involved, but every time he tries to voice his opinion, she shouts at him to keep quiet. Should I say something to someone?

Yes. This is an example of verbal/mental abuse by the daughter. You must report this immediately to your supervisor, Director of Nursing, or Executive Director who will ensure that the situation is handled appropriately.

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Q I work in the Environmental Services department. I love my job, but I sometimes forget to knock on the door to a resident's or patient's room and ask permission to enter. It's my job to deliver their clean laundry. I'm always polite, and no one ever complains when I go into their room. I think it's a silly rule that I first have to knock and ask permission to enter. Is it OK for me to just deliver the clothes without doing this?

No. Requiring staff to knock on doors and ask permission to enter is not a "silly rule" – it is a federal regulation. All residents and patients have rights guaranteed to them under federal and state laws and regulations. Each resident and patient has the right to be treated with respect and dignity and that includes respecting their privacy. All associates are responsible for the preservation of residents' and patients' rights.

A

SAFEGUARDING THE PRIVACY OF OUR RESIDENTS AND PATIENTS

Our Commitment

During the course of their care, we gather a great deal of personal information about our residents and patients. It is our duty and legal obligation to safeguard this Protected Health Information (PHI) to prevent inappropriate access, use, and disclosure. We are committed to following all laws, rules, and regulations related to resident and patient privacy, so we only access and use PHI needed to do our jobs or when required by law or regulation. We can only disclose PHI with proper authorization.

What to Know

- Life Care has developed policies and procedures to help you ensure that all PHI is safeguarded.

PHI includes information such as:

- Demographics (e.g., names, birthdates, phone numbers, email address, geographic identifiers, gender)
- Medical record number
- Social Security Number
- Insurance ID number
- Diagnoses
- Medical test results
- Medications
- Payment information

What to Do

- **Uphold resident and patient privacy.** Follow our policies and procedures. Do not access, use, discuss, or share PHI except when necessary for treatment, payment, or healthcare operations. Ensure you have authorizations for any disclosures.



WHAT IT MEANS

Protected Health Information

Protected Health Information includes medical, financial, and personal information that can be used to identify an individual. This includes all such information exchanged verbally or maintained in written or electronic form. The Health Insurance Portability and Accountability Act (HIPAA) of 1996 and its related regulations guide us in how we may use and share this information appropriately.

- **Access only the PHI you need.** For example, if you only need a resident's or patient's insurance ID number to complete a task, do not access the entire medical record.

HOW TO LIVE IT

Q I am a CNA, and yesterday I ran into Mrs. Miller while I was out shopping. Mrs. Miller regularly comes to our facility to visit some of our residents who are her church friends. During our chat, Mrs. Miller said she had just returned from a trip and wondered how her friend, Mr. Jones, is doing. Mr. Jones is regularly one of the residents I care for, but I did not tell her much, only that he was still a resident and his condition has not changed recently. Did I tell her too much?

Probably not. Although Mrs. Miller is not a member of Mr. Jones' family and probably not involved in his care, it is acceptable to acknowledge to anyone who asks about him that he is a resident/patient at our facility as long as Mr. Jones has not told us that we cannot do it. A better response would have been to thank her about her concern for our residents and patients, but politely inform her that you are not allowed to give out information about facility residents and patients without their authorization.

A

Q During our lunch break at work, one of my coworkers started talking about a newly admitted resident who was a volunteer at the facility. She said he had severe osteoporosis, several fractures, depression and is on a certain antidepressant. Is this a privacy violation?

Maybe. If the information she shared was relevant to the resident's current treatment and it involved you, for instance assisting him or her to get out of bed, then it would be appropriate use of PHI. However, if this was casual conversation over lunch and you did not have a need to know, then it would be a violation of our privacy policies.

A

- **Limit communication with others about PHI.** Avoid conversations or electronic communication with associates about PHI, unless they have a work-related “need to know.” Do not talk to anyone outside Life Care about PHI unless they are authorized to know.
- **Avoid mentioning PHI on social media.** Never post information or photographs that could be linked to a resident or patient on social media, social networking sites, or blogs without their authorization.

influencing a business decision. Further, we will never offer or accept such courtesies if the intent is to influence objective business decision-making or in exchange for any referrals to a Life Care facility.

What to Know

- **Residents, Patients, and their Families.** Those in your care may offer you gifts, gratuities or tips as an expression of gratitude. Accepting such a courtesy may give the impression that you are providing special care to, or somehow favoring, a particular resident or patient. Also, it may be perceived that you are inducing the individual to stay longer at our facility or causing them to accept medically unnecessary services.

- **Outside Business Partners.** Business courtesies can cause conflicts when they involve current and potential business partners and other individuals or entities outside of Life Care. Giving or accepting these courtesies can be seen as an attempt to improperly influence the relationship. When outside entities offer you materials, funding, or other resources for educational purposes, you must obtain approval from our Legal and Risk Services department before accepting.

- **Government Representatives.** When government personnel or contractors are involved, strict guidelines prohibit any type of gratuity or payment for their meals, travel, or lodging expenses. They must pay their fair share whenever participating in joint work with Life Care (e.g., they buy their own meal if a meeting runs into lunchtime).

Government workers know these regulations and should automatically decline any courtesy that is improper for them to accept. If you give anything of value to a government official, it could be a legal violation even if there is no intent to influence the official’s action or decision. This means you cannot entertain an official, or engage in other activities favorable to influencing them, without first obtaining authorization from Life Care’s Legal and Risk Services or Compliance department (see also section entitled “Political Participation”).

WHERE TO FIND MORE

- Health Information Management Manual



GIFTS, ENTERTAINMENT, AND BUSINESS COURTESIES

Our Commitment

A modest gift of thanks or an inexpensive business dinner with a supplier may be acceptable. However, these can look like conflicts of interest or an illegal kickback if offered in exchange for a referral or special favors.

We avoid real or perceived conflicts related to gifts, entertainment, or business courtesies, which occur especially if the gesture happens frequently or the value is large enough to cause someone to think it is



What to Do

- **Never solicit or accept gifts and courtesies from those in our care or their families.**

However, incidental gifts (e.g., perishables such as food) that can be shared with other associates may be accepted at the discretion of facility management.

- **Never solicit items of value.**

You cannot request any tangible or intangible item of value, even a favor, from any person or entity outside of Life Care (e.g., vendors).

- **Do not give or accept cash or cash equivalents.**

This includes tips, gratuities, and gift cards, including those for particular stores or food establishments.

- **You may offer or accept some courtesies involving business partners.** Modest

gifts of perishables or consumables, as well as gifts, entertainment, and other business courtesies of nominal value (\$50 or less), may be accepted if they are given no more than three times per year and shared with coworkers, if practical.

- **Uphold the policies.** Comply with policies of the recipient's organization and our own when offering any business courtesy.

- **When courtesies involve government workers, follow our policies.** You must also uphold any state or local regulations that pertain to business courtesies. It is important to get authorization from Life Care's Legal and Risk Services or Compliance departments before entertaining a public official or engaging in unauthorized

lobbying efforts. (see section entitled "Political Participation").

- **Refuse inappropriate courtesies.** This may be uncomfortable for you or offensive to the giver, but when a courtesy is improper, you must politely decline it.
- **Ask for guidance when you are unsure.** Consult with your supervisor or another Life Care resource such as the Legal and Risk Services or Compliance department.



WHERE TO FIND MORE

- Gift and Entertainment Policy
- Non-monetary Compensation Policy

IF I AM OFFERED...



A gift card for \$20 to a coffee shop



A box of homemade cookies from a resident's family



Two tickets to a local theater performance with face value of \$15 each from a vendor who is not attending



\$10 cash tip from a discharging patient



A few notepads and pens with a supplier's logo



A patient offers a free spring yard cleanup from her husband's landscape company.

MAY I ACCEPT?



No. Gifts of cash or cash equivalents, such as gift cards, cannot be accepted.



Yes. A gift of cookies can be accepted if you share with your coworkers.



No. While the ticket value is low, entertainment should be focused on developing the vendor relationship, which cannot happen if he or she does not attend.



No. Even though the tip is nominal in value, cash gifts are not permitted.



Yes. A few inexpensive promotional items may be occasionally accepted.



No. This could appear to be an inducement for special favors or care.



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DIVERSITY, NON-DISCRIMINATION, AND HARASSMENT-FREE WORKPLACE

Our Commitment

Life Care brings together a workforce with various skills, perspectives, experiences, and other personal characteristics. This diversity of talent creates strong teams that consistently deliver the best quality care. We respect coworkers, job applicants, and business partners, judging them only on their qualifications, skills, and achievements.

What to Know

- Each of us is responsible for respecting, accepting, and valuing individual differences among fellow team members, and for treating them in the way they deserve to be treated.
- Unlawful harassment, discrimination, and other unwelcome conduct is prohibited based on race, color, religion, sex (including



WHAT IT MEANS

Unlawful harassment

Unlawful harassment includes, but is not limited to:

- Slurs or epithets;
- Verbal or non-verbal threats;
- Derogatory comments in verbal, written or electronic form;
- Verbal or physical conduct of a sexual nature that creates an intimidating, hostile, or offensive working environment.

pregnancy, gender identity and sexual orientation), national origin, age (40 or older), disability, genetic information, veteran status, or any other characteristic protected under federal, state, or local laws.

- Disruptive behavior that creates an intimidating or hostile workplace is not permitted.

What to Do

- **Act with respect.** Treat others professionally and

HOW TO LIVE IT

Q

I told a joke at work about my own ethnicity. No one listening was from the same ethnic group. Everyone laughed after I told the joke, but later HR told me someone complained. I did not mean to offend anyone, so how could this happen?

You never know who might be offended by a joke, even if all listeners seemed to enjoy it and they do not appear to share the characteristic in the joke. You may think it is funny, but someone in the audience may have had a friend or family member of that ethnicity, or maybe they simply do not like derogatory comments about any culture. Also remember, your intent does not matter – just how it is perceived.

A

with respect at all times. Be aware of how others perceive your conduct. Comments, jokes, emails, texts, pictures, and other materials that seem appropriate to you may be offensive to others in the workplace.

- **Avoid inappropriate bias.** Do not discriminate against others based on any characteristic protected by law or Life Care policy.
- **Support diversity.** Be inclusive of others and help them feel like a valued member of the team.

level of diligence with which we protect that of our residents and patients.

- Only a few associates will need to access, use, or share coworker or business partner personal information for work purposes. However, if you should accidentally encounter such information in the workplace, you must know what to do to protect it.

What to Do

- **Understand the types of protected personal information.** Many types of personal information are protected by law and our policies, such as personally identifiable information (PII) including Social Security Numbers, bank accounts, and credit card numbers.
- **Protect the personal confidential information of others.** This includes current and former associates, job applicants, physicians, contractors, and other business partners. Ensure this information is secured with limited access and transmitted electronically according to our policies.
- **Do not share personal information outside the Company.** The only exception is if your job involves handling the personal information of associates such as Human Resources, Accounts Payable, Benefits staff, or certain



WHAT IT MEANS

Personally Identifiable information

Personally Identifiable information is any data that could potentially be used to identify a particular person. PII includes many types of data, such as name, driver's license number, financial accounts, email addresses, physical addresses, phone numbers, and birth date. Many types of PII are similar to PHI (e.g., address, birthdate), but PHI is the term used in a healthcare context, and includes medical information.

business partners who need access. Seek advice from the Legal and Risk Services department if a regulatory body, law enforcement, or anyone else requests associate information.

- **Access or discuss personal confidential information only with a legitimate business purpose.** Business conversations involving this information must be conducted in a place where they cannot be overheard. Laptops should be used securely to avoid exposing the information.
- **Destroy personal information that is no longer needed.** Follow our record retention policies when such information is no longer required for business purposes.

WHERE TO FIND MORE

- Associate Handbook
- Respect Training



PERSONAL PRIVACY

Our Commitment

Some of us have access to the personal information of our coworkers, business partners, and others outside of Life Care. Personal confidential information can be used to commit identity theft and to harm individuals. We are dedicated to protecting this information, accessing, using, and disclosing it only when necessary to do our jobs.

What to Know

- We protect the privacy of our coworkers' and business partners' personal confidential information with the same

- **Promptly report loss or unintentional disclosure.**

Bring the issue to your manager or another Life Care resource. Do this promptly because time is critical to addressing the problem.

waste are often used or generated. Life Care is responsible for the proper handling and disposal of these materials to protect the environment.

hazardous materials into the air, sewage systems, water pollution control facilities, or onto land.

WHERE TO FIND MORE



- Computer Security Guide
- IT Security Policies
- Confidentiality of Life Care Information Policy

SAFETY, HEALTH, AND ENVIRONMENT

Our Commitment

We provide a safe and healthy work environment for associates and visitors to our facilities. Each of us is responsible for acting in a way that protects the health and safety of our coworkers, our residents and patients, and others in the workplace. We also have a responsibility to protect and preserve the natural environment.

What to Know

- In the course of Life Care's operations, hazardous and infectious materials and

- Life Care has a zero-tolerance policy against threats or acts of physical violence. This includes abusive or aggressive behavior intended to threaten or intimidate another person in our workplace or at any off-site work-related activity. Do not tolerate physical violence or threats of harm.
- No firearms or weapons will be allowed on Company property at any time, except for those carried by law enforcement officers.

What to Do

- **Uphold the standards.** Follow all Company health and safety standards, including those related to the handling, storage, and usage of hazardous materials, other pollutants, and waste.
- **Ensure the Company complies with its permits, as required.** These allow Life Care to safely discharge

- **Engage qualified disposal services.** Hire only reputable, licensed services to transport and dispose of hazardous materials, pollutants, and infectious wastes.
- **Do not conceal improper dumping.** No one at Life Care may conceal improper discharge or disposal of hazardous materials, pollutants, or infectious wastes.
- **Accurately maintain all records.** Permits, approvals, records, and controls must be maintained as required by environmental laws and regulations until such documents are destroyed with permission of the Legal and Risk Services department, or in accordance with our record retention policy.
- **Manage physical safety.** Uphold security standards by following facility entry and ID protocols, such as badging in without allowing

HOW TO LIVE IT

Q During a late shift, I noticed a puddle of colored liquid on the floor. I asked my coworker what it was, but she didn't know. I used paper towels to wipe it up, and I threw them in the trash. This seemed OK, but should I have done something else?

Yes. You should have reported the issue immediately to your supervisor or whomever was in charge of the shift. If the liquid was hazardous and thrown in the regular trash, it could be harmful to others. If you wore gloves to do the cleanup, you were likely protected, but maybe not adequately if the fluid was infectious or hazardous. After the wipe up, the floor may have required special cleaning.

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others to “tailgate” through. Ensure safety by keeping work areas, hallways, and resident rooms free from obstacles, unsecured wires, and other potential hazards.

- **Promptly report any concerns.** Notify your supervisor or another Life Care resource about any unsafe equipment, violence, or other situation that could threaten human health or safety or damage the outside environment.
- **Keep the workplace safe and healthy.** Every associate plays a part in maintaining a safe and healthy workplace by preventing, watching for, and reporting unsafe practices or work conditions.

ALCOHOL AND DRUG USE

Our Commitment

Life Care’s committed to providing a safe environment

and the highest level of service, while minimizing the risk of accidents and injuries. This can only be achieved by associates who come to work free from the influence of alcohol and illegal or misused drugs.

What to Know

- All associates must be free from the influence of alcohol, illegal drugs, and misuse of prescription drugs while on facility property or while performing job duties on behalf of Life Care.
- Distributing or possessing alcohol, illegal drugs, or legal controlled substances that are improperly obtained at work or while on duty is prohibited.
- Off-the-job manufacturing, distribution, dispensing, or possession of illegal or unauthorized substances is not permitted.
- Off-the-job substance use is prohibited if it affects work performance, (e.g. absenteeism, tardiness, or poor job performance).

What to Do

- **Never come to work impaired by substances.** You cannot perform your work duties properly and safely under the influence of alcohol, illegal drugs, or legal controlled substances that are improperly obtained or misused.
- **Report any use or presence of prohibited substances at work.** This can prevent accidents and injuries before they happen.
- **Fulfill your extra responsibilities if controlled substances are part of your job.** Ensure they are securely stored and accounted for according to policy. Immediately report any missing or diverted drugs.
- **Report drug convictions.** If you are convicted of a drug violation, you must notify your supervisor immediately.

WHERE TO FIND MORE

- Omnicare Manual
- Infection Control Manual
- Environment of Care Manual
- Wound Care Manual



WHERE TO FIND MORE

- Drug and Alcohol Policies



HOW TO LIVE IT

Q I know that my coworker uses illegal drugs when she is not at work. It does not seem to affect her at work, except when she is late to work after using. I know the drugs are the cause, but should I tell our supervisor?

Yes, you should tell your supervisor if you know or suspect your coworker has a substance abuse problem. He or she will be able to address the tardiness, whatever the cause. The bigger issue that must be addressed is your coworker's possible abuse of illegal drugs that could eventually result in harm to a resident or patient, another associate, herself, or someone else. Your supervisor may also involve Human Resources or others for follow up.

A



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BILLING FOR SERVICES

Our Commitment

We will comply with all payor rules and prepare accurate, properly coded billing statements that reflect only medically necessary and billable services provided and documented in the medical record.

What to Know

- The False Claims Act prohibits us from knowingly submitting false claims to or withholding money due to Federal healthcare programs. Many states also have false claims laws. Our policies prohibit us from knowingly sending inaccurate or false claims to any of our payors.
- An innocent misunderstanding, careless mistake, or error related to billing has potentially serious consequences. It could lead to allegations of fraudulent billing practices, which could expose Life Care and its associates to legal liability.

What to Do

- **Properly document care and treatment information.** Resident and patient records must be accurate, timely, and complete.
- **Follow proper coding procedures.** Assign codes accurately based on the information in the medical record.



WHAT IT MEANS: False Claims

False claims could include:

- A service or item that was not provided, not medically necessary, or billed more than once
- A non-covered service billed as a covered service
- Services billed separately that are covered in the room rate
- Inadequate or substandard care
- Use of inaccurate coding ("upcoding") or of patient status to increase reimbursement
- Failing to promptly identify and refund overpayments
- Submitting bills that are not supported by clinical documentation

Knowingly means actual knowledge or acting in reckless disregard or in deliberate ignorance of the truth or falsity of the information.



- **Create accurate bills.** Only bill for items and services provided based on the care documented in the medical record.
- **Review bills thoroughly prior to submitting a claim.** Follow Life Care’s policies and procedures for checking claims against supporting documentation to ensure any errors identified are corrected prior to billing.
- **Promptly research and resolve potential overpayments (e.g., credit balances).** If a claim appears to have been overpaid, promptly review the account to determine if a payor or individual has overpaid the amount due and, if so, refund any overpayments as soon as practical. Any refund must be made within timeframes set by federal and state laws.

- **Raise any billing concerns.** If you become aware of or suspect any inaccuracy or other issue in the coding and billing process, including overpayments, immediately raise the issue to your supervisor or another Life Care resource.



WHERE TO FIND MORE

- Weekly/Monthly Triple Check Policy and Procedures
- Reporting and Returning Overpayments Policy
- Rehab Services Manual



HOW TO LIVE IT

Q The physician for one of our Medicare Part A residents is out of town, so I have not been able to get his signature on the Physician Recertification that is due. We are supposed to submit our Medicare bills today. Can I submit the bill and get him to sign the Recertification later when he returns?

No. A valid Physician Certification/Recertification for Medicare services is a condition of payment under federal regulations. Consequently, we cannot submit a Medicare Part A claim without a required Recertification if one is due. When the physician returns, you should complete a Delayed Recertification that includes an explanation of why it is late (“Physician was out of town when Recertification was due”), then have the physician sign and date it. You may then bill the claim.

A

Q I am not involved in the billing process, so how does this billing standard apply to me?

If you are not directly involved in billing, you may help ensure regulatory compliance and ethical practices in the billing process by providing accurate, timely, and complete documentation of the services that you provide.

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CONFLICTS OF INTEREST AND LOYALTY

Our Commitment

To best serve those in our care, we set aside our own interests when they conflict with those of our Company, our residents, or our patients. We will not divide our loyalties or use our position for our own benefit or for that of our families and friends.



WHAT IT MEANS

Conflict of interest

A **conflict of interest** may occur when you have a competing personal interest that divides your loyalties and interferes with your ability to make objective decisions for the Company. A personal interest exists when you, your friend, or a member of your family stands to gain as a result of your decision. Failure to use good judgement to avoid these situations can undermine the trust others place in Life Care, damaging its reputation and our ability to serve those in our care.

What to Know

A conflict can occur in many personal and business situations.

- **Corporate opportunity.** If you learn about a business opportunity due to your job that would benefit Life Care, the Company must give you approval before you or a family member may pursue it.
- **Outside employment or other service.** Any outside employment, consultant relationship or service (e.g., membership on a community board) should be discussed with your supervisor in advance to make sure any potential conflicts are addressed.
- **Personal investments.** You must not have substantial investment in one of Life Care's customers, suppliers or competitors, unless the investment complies with Life Care's Conflicts of Interest

policy. "Substantial" generally means that your investment is big enough to potentially influence your decision-making to benefit your investment at the Company's expense.

- **Personal relationships.** Avoid having a family or intimate relationship with another associate within your management chain or if you have influence over the person's salary or career path. If you are in such a relationship with a subordinate or supervisor, or with a current or potential business partner, you must disclose it to your supervisor or higher level manager.

What to Do

- **Examine your loyalties.** Consider only the best interests of Life Care and its residents and patients when making business decisions.

HOW TO LIVE IT

Q My sister owns a quality catering business with moderate prices. Can I pass her name along to the associates who select these services for our facility?

Yes. Life Care is always looking for excellent business partners and vendors, and your sister may fit the criteria. It is OK to pass her name along, but you cannot be involved in the selection process. Also, if you are a Life Care leader, recognize that a suggestion from you may be perceived as a mandate to those who engage these services. Be careful not to send this message by making it clear you understand she must compete for the business.

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Q Sue and Tom are managers in different departments who are also close friends. Crystal, Tom's daughter, works at Life Care as well and reports to Sue. Crystal is not a great worker, but Sue (who is my boss) seems to give her better schedules, more flexible work hours, and other benefits that the rest of us do not receive. Is this a conflict of interest or just unfair?

It could be both. If Sue and Tom are such good friends that it appears the relationship clouds Sue's objective business decisions related to Crystal, this could be a conflict of interest. This situation needs to be disclosed and addressed. Because this also feels unfair to you and likely other coworkers, even if this is not deemed to be a conflict after investigation, Sue will be informed of the perception of unfairness she has created. She will be required to work with the Human Resources department to address it.

A

- **Be aware.** Recognize and avoid activities and relationships that are, or may appear to be, conflicts of interest.
- **Choose business partners wisely.** If you select business partners or vendors, choose them based only on their merit. If a friend, family member, or a company they own seems like a good potential Life Care business partner, recuse yourself from the selection process and disclose the relationship to your supervisor.
- **Speak up.** Disclose any actual, potential, or perceived conflict of interest to your supervisor or another Life Care resource.

Each of us is personally responsible for protecting company assets to prevent loss or damage. Examples of Company assets include finances, facilities, equipment, medical supplies, information systems, intellectual property, and confidential Company information.

What to Know

- Life Care assets are both tangible (e.g., things you can touch) and intangible (e.g., ideas and information). They must be used primarily for Company business.
- Personal use of Company assets is prohibited, except in limited situations. Personal use must not negatively affect productivity or the work environment.
- Life Care has the right to monitor usage of its equipment, network, and systems. Automated software may be used to monitor material created, stored, sent, or received on its computer networks. No one should expect privacy related to his or her internet or email usage.

What to Do

- **Use assets properly and for intended purposes.** You are responsible and accountable for the integrity and protection of our assets. You must take steps to protect resources that have been entrusted to you.
- **Follow all policies for use of computer equipment.** Do not share passwords or allow other people, including friends and family, to use Life Care technology resources. Company equipment may not be used to generate, store, or send offensive content. Only use software that has been properly licensed. Never add your personal software to Company computers or computer systems.
- **Avoid any harmful use of Company assets.** Never use resources in a way that causes loss or reputational damage to the Company.

WHERE TO FIND MORE

- Associate Handbook
- Conflict of Interest Policy



PROTECTING COMPANY ASSETS

Our Commitment

We use Company assets wisely and for appropriate purposes.

HOW TO LIVE IT

Q

I overheard a manager commenting about using some of the tools in our facility's maintenance department over the weekend at his rental home. He brought the tools back on Monday. Should I tell anyone about this?

Absolutely. Life Care's resources such as its tools and equipment are meant to provide a safe and secure environment for our residents, patients, and coworkers. You should inform your supervisor immediately about what you heard.

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- **Get prior permission to use assets for community activities.** Your supervisor must pre-approve the use of the Company name and resources in any community events or fundraisers. Political fundraisers cannot be approved.
- **Managers must set up controls.** Appropriate internal controls must be established over all areas to safeguard Life Care's assets and the accuracy of its financial records and reports.
- **Speak up about misuse.** Speak up about any actual or suspected misuse of, or accounting for, Life Care's resources. Bring your concern to your supervisor or another Life Care resource.

What to Know

- The use of computers and electronic systems makes confidential information accessible to many associates.
- The Company prohibits use of confidential information obtained during employment for any personal benefit without Life Care's written consent. This prohibition continues after employment ends.
- Our business partners' confidential business information also must be protected as if it was our own.

What to Do

- **Properly use and disclose confidential business information.** Access and share it only for legitimate business purposes. Protect intellectual property and confidential information by disclosing it only to authorized parties.
- **Follow our information security policies.** Safeguard information in both paper and electronic formats. Never share passwords or disclose information in public forums. Documents containing sensitive data, including information concerning residents or patients, should be handled carefully during



WHAT IT MEANS

Confidential Company Information and Intellectual Property

Confidential Company Information is data related to Life Care business that is proprietary, has not been published or disclosed publicly, or is otherwise restricted from being widely communicated.

One type of confidential information is **intellectual property**, which is an idea, design, or other concept owned by the Company. Sensitive data like this is often marked "confidential," but not always. You must be able to identify confidential material by its nature.

Examples of confidential information include: Company methods, processes, techniques, computer software, equipment, service marks, copyrights, research data, clinical data, marketing and sales information, personnel data, patient lists, financial data, plans, and all other undisclosed know-how and trade secrets.

work hours and must be properly secured when not in use.

- **Access and maintain confidential information only on Life Care information systems.** Never store or access confidential information on a personal

WHERE TO FIND MORE

- Associate Handbook



CONFIDENTIAL BUSINESS INFORMATION

Our Commitment

One of Life Care's most valuable assets is our Company information. We have a duty to safeguard this confidential Life Care business asset. We are careful to physically secure such information, use it only when needed for business purposes, and avoid discussing it in places where we could be overheard.



HOW TO LIVE IT

Q

A new grocery store opened in town. Its marketing person called to request a list of our associates' names and addresses so she could send them information about a grand opening giveaway. Is it okay to send the list?

No. Associate names and addresses are confidential information and cannot be disclosed without authorization. This would also be a disclosure of associate personal information that is prohibited without a legitimate business purpose.

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computer or other media. All computers and other devices, including storage media (e.g., USB devices) that will be used to store or access confidential information should be obtained from or authorized by Life Care's Information Technology department.

- **Protect others' confidential business information.**

Business partners' pricing, agreements, and other sensitive business data must be safeguarded as securely as our own. Also protect and do not misuse the intellectual property of others, such as purchased software.

- **Be vigilant.** If you observe individuals whom you do not recognize using terminals in your area, report this to your supervisor immediately.
- **Report misuse, loss, and disclosure.** Promptly speak up to your supervisor or another Life Care resource if you believe confidential information has been potentially mishandled, stolen, or lost.

CREATING AND MANAGING OUR BUSINESS RECORDS

Our Commitment

Residents, patients, business partners, our associates, government officials, and contractors rely on the accuracy and completeness of our disclosures and business records. Every associate is responsible to maintain truthful and complete records of all types, including patient records, work records, financial records, and all other corporate documents in a way that is consistent with our policies.

What to Know

- Life Care is required by law to retain certain types of medical and business records, usually for a specified period of time. Failure to do so may result in fines, penalties, and legal liability.
- The Company has established policies and procedures to ensure appropriate



WHAT IT MEANS Business Records

The term "business records" covers a wide variety of documents in healthcare, including expense reports, medical records, treatment plans, billing claims, purchase agreements, benefit claims, associate records, financial statements, marketing plans, invoice payments, controlled substance records, cleaning logs, and much more. You likely work with more than one type of record at Life Care and play an important role in ensuring their accuracy and completeness.

maintenance, retention, and destruction of records.

- All Company records should be retained and destroyed in accordance with the schedules outlined in applicable policies. Legal liability could result if a document is destroyed before its scheduled destruction date.
- Established accounting practices and procedures must be followed to assure the complete and accurate recording of all transactions.

What to Do

- **Create accurate, professional, and complete business records.** Write your business communications carefully and clearly, whether on paper or electronically. Poorly written documents and communications may create misunderstandings. Remember, anything created

WHERE TO FIND MORE



- Associate Handbook
- Confidentiality of Life Care Information Policy

HOW TO LIVE IT

Q

We have many old records at our facility dating back several years. Is it OK if we destroy some of the older ones?

Maybe. Life Care and other entities must keep records for a certain length of time depending on the type of record. In addition, there may be a "legal hold" on some records because of a legal proceeding. Please consult with your supervisor, another supervisor in your chain of command, or the Legal and Risk Services department before destroying records.

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or sent on a computer will likely be viewed by others and could be used against you or the Company.

- **Know your responsibilities related to records.** Be familiar with the record-keeping procedures that apply to your job. You are accountable for the accuracy and truthfulness of the records you create and sign.
- **Comply with records retention and destruction schedules.** Make sure you know the schedules for your department, division, region, or facility. Destroy records,

only according to our records retention policy, and never in response to, or in anticipation of, an investigation or audit. If you think that documents should be saved beyond the prescribed retention period, consult your supervisor or Life Care's Legal and Risk Services department.

- **Comply with legal holds.** A "legal hold" informs associates when information must be preserved for potential litigation or investigation. Information that is under a legal hold cannot be destroyed per the normal schedule until the hold is lifted by the Legal and Risk Services department.
- **Properly destroy protected information not needed for a task.** "Incidental" or minor documents containing protected data that may be created or obtained in the everyday course of business must be destroyed appropriately when it is no longer needed or not required to be retained.
- **Watch for potential fraud.** Be alert for any false statements, omissions, incomplete or misleading information, or any other inaccuracy in our records. Speak up to your supervisor if you have any concerns.

ANTITRUST, FAIR COMPETITION, AND TRADE PRACTICES

Our Commitment

We are committed to avoid practices that limit free and open competition. We never seek to gain competitive advantages through unethical or illegal means, but rather through superior care and services. We also commit to trade practices that do not use inside information for our own benefit or the benefit of others.

What to Know

- Anti-competitive or antitrust laws make illegal any formal or informal agreement or understanding in any format that restricts competition, whether expressed or implied.
- Such laws are designed to preserve and promote fair and honest competition. The greatest danger for violations lies in interactions with competitors.



WHAT IT MEANS

Antitrust laws

Antitrust laws are complex. The rules vary based on the situation, but typical activities that may be considered antitrust violations that should be avoided or reported, include discussing the following with competitors:

- Future Life Care business plans,
- Current Life Care prices or reimbursement levels,
- How business will be conducted with suppliers or customers.

WHERE TO FIND MORE



- Retention and Destruction of Medical Records Policy
- Document Retention Policy for Corporate Campus

- No associate should participate in any behavior that may be viewed as restricting competition.
- Although Life Care is a privately held company without publicly traded stock, we are prohibited from engaging in insider trading of public company securities.

What to Do

- **Use good judgement when talking with competitors.** Avoid discussions about competitively sensitive information or limiting competition. If such a conversation occurs, leave the meeting immediately and

report the matter to our Legal and Risk Services department.

- **Protect competitive information of third parties.** Never share competitively sensitive information of business partners or other third parties with their competitors.
- **Use care when trading securities.** Never buy or sell securities of any other company based on material, nonpublic information about that company. Never “tip” others to do it.
- **Ask if you are unsure.** If you have questions or

are uncertain about how antitrust laws may apply to a certain activity, contact your supervisor or another Life Care resource.



WHAT IT MEANS Insider Trading

Insider trading is the practice of trading the securities of public companies based on material information before it is made public. If this information is passed on to others who then trade the securities, it is called “**tipping.**”

Both of these practices are against the law regardless of whether you, or a person you tipped, benefit from the trade.



HOW TO LIVE IT

Q My neighbor works at a long-term care facility in town that is a friendly competitor of Life Care. We started talking at a local event and she mentioned the struggle her facility was having with increasing costs of supplies. I told her how Life Care was negotiating a new nationwide contract with a supplier that will reduce our prices and result in a huge revenue increase for the supplier. Did I do anything wrong?

Yes. You should not talk with competitors about the circumstances under which Life Care conducts business with suppliers, other third-party partners, or customers. This potential antitrust matter should be reported to our Legal and Risk Services department.

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FAIR DEALING WITH THIRD PARTIES

Our Commitment

Our business partners, suppliers, vendors, and competitors play an important part in the success of our business. Third party partners provide Life Care with critical services and goods that further our mission. Competitors motivate us to find new and better ways to deliver quality care and serve others. We value these third parties and

treat them fairly, honestly, and ethically.

What to Know

- We embrace objectivity in selecting our business partners, focusing on qualifications and diversity in the selection process.
- We gather competitive intelligence legally and ethically – never through fraud, misrepresentation, or deception.
- We do not make false claims about competitors' capabilities or services.

Find this information in publications, websites, industry feeds, and other public sources.

- **Honor others' confidentiality obligations.** Respect the duty of others to keep confidential the competitive information they must protect.
- **Keep non-public business information of third parties confidential.** This includes price lists, strategies, and agreements.
- **Select business partners based only on their merits.** Do not be influenced by their personal relationships or your own biases.
- **Be careful in accepting competitive information from third parties.** Know their sources and be sure the information is not protected by non-disclosure or confidentiality agreements or trade secret laws.

WHAT IT MEANS

Business Partners



Business partners refers to outside organizations or companies that do substantial amounts of work with us to fulfill a key need in our operations (e.g., contracted pharmacy provider).

Vendors typically provide services. **Suppliers** provide products and materials. The term "business partners" is often used to include all three types of third parties.

What to Do

- **Treat our business partners the way you want to be treated.** Conduct these relationships with mutual respect, honesty, fairness, and without discriminating.
- **Obtain competitive information from appropriate sources only.**



COMMUNICATING WITH THE PUBLIC

Our Commitment

Life Care must speak with one voice when communicating to the public about disclosures, announcements, or other information. This helps us deliver messages that are objective, transparent, and consistent. We communicate professionally and honestly with the public according to the highest standards of integrity. Our social media posts and internet communications reflect good judgement and personal responsibility.

What to Know

- Only authorized persons are permitted to speak on behalf of the Company.
- Our marketing and public-facing materials must be truthful and accurate.
- Our social media policy is designed to protect the Company and its associates rather than to restrict protected speech and the flow of useful and appropriate information. It should not

be interpreted to restrict an associate's constitutional or statutory rights.

What to Do

- **Refer requests from the media.** Refer all requests for information from any news media representative to the President's Office or Life Care's Director of Public Relations.
- **Ensure a consistent voice in our marketing messages.** All advertising or marketing materials related to Life Care must be accurate, ethical, and non-offensive. Ask for assistance from the Legal and Risk Services department to review and approve any such materials before using.
- **Pre-approve outside speaking or writing engagements.** Seek approval before making public speeches, writing articles for professional journals, or other public communications, if you are identified with Life Care.
- **Access social media only for business purposes.** Associates may not access social media sites from



WHERE TO FIND MORE

- Social Media Policy

Company-issued equipment or systems at any time unless the sites are being used to perform their job duties and have been approved by their supervisor.

- **Use good judgement on social media.** Exercise personal responsibility to avoid postings that may negatively impact Life Care's business and reputation.
- **Speak on your own behalf in all postings.** If you identify yourself as a Life Care associate, or discuss matters related to the Company or the healthcare industry on a social media site, include a clear disclaimer stating that your opinions are yours alone and do not represent the official views of Life Care.
- **Never disclose or post residents' or patients' personal information.** This includes posting resident or patient images, personal medical information, or other personal information.

HOW TO LIVE IT

Q I was chatting with my coworker last night on a social media site, and we started discussing a resident. We never mentioned his real name, but we did talk about his age and medical condition and our opinion that he is very cranky. Was this OK to do?

Not exactly. Chatting about a resident or patient in a respectful manner without identifying him would be OK. In this case, combining his age and diagnosis may be enough to discover his identity, which is not OK. However, what is definitely against our standards is your comment about his attitude. This could reflect negatively on Life Care, especially if your connection to Life Care was clear and you did not state that you were expressing your own opinions.

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HEALTH CARE LAWS AND REGULATIONS

Our Commitment

Life Care operates in a highly regulated industry governed by laws and regulations that can be lengthy and complicated. We understand that compliance with these rules is critical to Life Care’s success. We are committed to upholding all the legal standards that apply to our jobs and to the Company’s business.

What to Know

- Life Care participates in the Medicare and Medicaid programs, which are both governed by extensive laws and regulations that require our compliance.
- The Federal False Claims Act prohibits knowingly submitting a false claim to the government for payment. As required by the Deficit Reduction Act of 2005 (DRA), Life Care strives to prevent, detect, and eliminate fraud, waste, and abuse in all government-funded programs from which the Company receives payments.
- As part of our commitment to integrity, we must maintain open, honest, and legal relationships with all current or potential referral sources. The two applicable federal laws related to our relationships with referral

sources are the Federal Anti-Kickback Statute (AKS) and the Physician Self-Referral Law or “Stark Law.” Many states have similar laws.

- The Health Insurance Portability and Accountability Act of 1996 (HIPAA) guides us in how to use, share, and protect the personal, protected health information of our residents or patients. We uphold this law by accessing, using, or



WHAT IT MEANS Fraud, Waste, and Abuse

- **Fraud** is knowingly and willfully executing, or attempting to execute, a scheme to obtain improper payment from a healthcare benefit program. Fraud examples include billing for services never rendered or that are medically unnecessary.
- **Waste** is overutilization of services or other practices that, directly or indirectly, result in unnecessary costs to the healthcare system, including the Medicare and Medicaid programs. It generally results from misuse of resources rather than criminal negligence. Waste would include overprescribing medication quantities or treatments in excess of what is necessary.
- **Abuse** in this context is payment for items or services when there is no legal entitlement to that payment and the individual or entity has not knowingly and/or intentionally misrepresented facts to obtain payment. An example of abuse would be accidentally upcoding a diagnosis to a more profitable level.

SPOTLIGHT:

Convictions, Exclusions, and Sanctions

You must inform your supervisor, another supervisor in your chain of command, or the Compliance department if you are convicted of a felony, are informed that you are under investigation, or advised that you are no longer eligible to participate in any federal or state program or contract such as Medicare or Medicaid.



disclosing resident or patient protected health information in oral, written, or electronic form only when we have a legitimate business reason to do so or when authorizations or the law require it. (See section on Safeguarding the Privacy of our Residents and Patients.)

What to Do

- **Uphold federal and state healthcare program requirements.** This includes Medicare and Medicaid laws and regulations, federal and state guidelines, provider agreements, and accreditation standards.

- **Comply with the False Claims Act.** Report concerns regarding actual or potential false claims such as billing for services not provided, not supported by documentation, or not billed in accordance with regulations or payor guidelines.
- **Comply with the AKS and Stark laws.** Avoid offering or accepting improper inducements. Never offer to pay, accept, or give anything of value to anyone for resident or patient referrals. Also, do not request or accept payments or anything of value from vendors or suppliers to influence decisions regarding purchase of goods or services used for resident or patient care that is reimbursable by a federal healthcare program.
- **Follow Company policies and procedures regarding contracts.** Obtain all required approvals before signing any contracts, and only sign contracts that have been reviewed and approved by the Legal and Risk Services department.
- **Follow Company policies on marketing to referral sources as well as to potential residents and patients.** The federal government has laws and regulations regulating how healthcare services and items are marketed if they are reimbursed by federal payors. In addition, the type and value of items used for marketing is also sometimes restricted. The Company has developed and implemented policies and procedures to protect Life Care and its associates involved in marketing its services. Associates should contact the Compliance department with any questions about marketing to residents, patients, or referral sources.
- **Uphold HIPAA and its Regulations.** Do your part to protect the privacy and security of our residents' and patients' protected health information. (See section on Safeguarding the Privacy of our Residents and Patients.)

HOW TO LIVE IT

Q Our medical director has approached me and asked for a raise in the hourly rate for his services. He said that he is also the medical director for another facility in the area that pays him a lot more. Can I give him the raise he is requesting?

Maybe. If you believe the facility's medical director deserves to be considered for a raise, you should contact the Legal and Risk Services or Compliance department to discuss. Life Care has a specific process that must be followed for all new medical director contracts as well as modifications to existing contracts. As part of that process, the proposed compensation terms are reviewed and prepared to ensure that they are at a "fair market" rate and are "commercially reasonable." Consequently, you should never make promises to a physician about his or her compensation or a prospective medical director agreement. In this instance, if it is determined that a raise is appropriate, a new contract with the revised terms must be approved per Life Care's policies and procedures, then signed and executed before any payment changes may be made.

A

- **Know Life Care policies and procedures related to applicable healthcare laws.**

The Company provides many policies and procedures to help you understand your responsibilities related to your job and these laws.

- **Speak up if you have questions or concerns.** Take questions and concerns about the laws to Life Care’s Legal and Risk Services or the Compliance department. Always consult with them before entering into a

relationship with someone that could make or influence referrals.

LICENSURE

Our Commitment

We ensure all applicable associates are properly licensed and follow the laws and regulations governing their respective professions.

What to Know

Associates who deliver care must have up-to-date licenses or certifications necessary for their respective professions. If an associate or a contractor provides services or treatments with an inactive license or certification (e.g., expired), there may be serious consequences for the associate, contractor, and Life Care.

What to Do

- **Maintain active licensure and adherence to professional standards.** All associates and others acting on behalf of Life Care must maintain an active license, certification, or other credentials for the state(s) in

which they work, and follow applicable state professional acts and codes of ethics at all times.

- **Notify your supervisor of any concerns.** If any issues arise such as expiration, probation, revocation, or any investigation that may lead to an action related to your professional license, inform your supervisor immediately so he or she may ensure that proper actions are taken.
- **Supervisors play a role.** Supervisors and managers are expected to be aware of these standards and promote compliance with the rules.
- **Speak up if you are unsure.** Questions or issues related to licensure or professional practice acts or codes should be referred to your supervisor or another Life Care resource.

WHERE TO FIND MORE



- Non-monetary Compensation Policy
- Gifts and Entertainment Policy
- New and Amended Agreements for Medical Director and Other Professional Services Agreements Policy
- Deficit Reduction Act of 2005, False Claims Act and Similar Laws Policy
- Associate Handbook



WHERE TO FIND MORE

- Professional Credentials Policy

HOW TO LIVE IT

Q I worked almost two weeks after my nursing license expired before I realized it, and then renewed my license online with the state board. Are there any consequences to Life Care for the gap in my licensure?

Maybe. In some states, if you are a few days late renewing your license, you may renew it and pay a small penalty with no other consequences (e.g., effective date of renewal is still the date it expired). In other states, if you are even a day late renewing your license, you are considered unlicensed for that day. Consequently, associates must inform their supervisor immediately if they realize their license has expired before it is renewed or when any action has been (or may be) taken related to their license (e.g., suspension, probation, investigation initiated that may result in an action affecting licensure). Your supervisor will then contact the Compliance department so it may analyze the situation and ensure that all necessary actions are taken.

A

REGULATED PHARMACEUTICALS

Our Commitment

We are conscientious and vigilant in carrying out our obligations to handle and dispense prescription drugs and controlled substances at Life Care facilities in accordance with all applicable laws, regulations, and Life Care procedures.



What to Know

- Laws covering prescription drugs and controlled substances support the integrity of our national drug distribution system and protect consumers by assuring that these drugs are safe, properly labeled, and administered to the correct patients.
- These laws prohibit diversion of any prescription drug or controlled substance in any amount and for any reason to an unauthorized individual or entity.
- Violation of any law or Life Care policy involving prescription drugs, controlled substances, or other pharmaceuticals may result in dismissal from employment.

What to Do

- **Safeguard all drugs.** Every associate authorized to

prescribe, dispense, or handle prescription drugs or controlled substances must maintain professional standards in safeguarding pharmaceuticals, and in preventing unauthorized access to them.

- **Report any potential or actual violations.** If you become aware of or suspect any potential lapses in security or an actual violation of law, policy, or regulation relating to drugs, (e.g., diversion of narcotics), you should report it immediately to your supervisor or another Life Care resource.



WHERE TO FIND MORE

- Clinical Services Manual
- Drug Diversion Policy and Procedure Manual

HOW TO LIVE IT

Q

While sweeping up in a resident's room, I found a drug blister pack on the floor containing a single dose of oxycodone HCL 10mg. It was dirty from being walked on, so I threw it away. Was this the right thing to do?

No. You should have given the blister pack to your supervisor. Oxycodone is a narcotic that requires accurate accounting to ensure that diversion or misuse doesn't occur. The facility is also required to investigate medication processes to prevent reoccurrences and ensure medications are properly destroyed.

A

Q

I know that at the end of every shift I am supposed to perform a count of all narcotics in my cart with the oncoming nurse taking over my duties. Sometimes it gets hectic, and we just sign off on the count sheet without conducting the count. As long as we perform the counts most of the time, it is OK, right?

No. Life Care has created and implemented policies and procedures to comply with the applicable laws and regulations to properly control and account for narcotics to prevent and detect drug diversion. You have a responsibility as an associate to protect the resident and patient and supply medications as ordered by the physician. Not performing the required drug count can result in undetected drug diversions, residents and patients not receiving care as ordered and the Company and its associates being sanctioned.

A



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SUPPORTING OUR COMMUNITIES

Our Commitment

Life Care strives to be a responsible citizen in the communities where it operates. While we each are encouraged to be active in our community by supporting events and causes, we avoid pressuring others to support or contribute to our favorite charities.

What to Know

- Life Care encourages associates to become actively involved in their communities.
- Life Care provides support to various educational, cultural, and civic endeavors. Such support may involve gifts of time, scholarships, sponsoring activities, and serving on community or university boards.
- Business partners may request contributions from Life Care for charitable causes. These must be approved through the

Company process, like all other contributions.

What to Do

- **Use good judgment when getting involved.** Carefully consider your participation in community activities so it does not conflict with your responsibilities to Life Care. If a business partner asks you for a contribution from your own funds, make sure it will not give the appearance of a conflict of interest.
- **Make sure your charitable causes are clearly your own.** Ensure that your personal support of charitable causes is not viewed as that of the Company.



HOW TO LIVE IT

Q I do volunteer work with a local non-profit group that asked me if Life Care would donate its old furniture for their office. They do good work in the community that benefits the elderly. Would the Company donate the furniture?

Maybe. It must first be made clear that Life Care will not seek or accept any improper advantage from making the donation. Then it must align with the Company's charitable giving policies. To make sure these issues are addressed, corporate donation requests must be referred to the Life Care President's Office or, if the request involves a facility location, refer to the Regional or Divisional Vice President for approval and processing.

A

POLITICAL ACTIVITIES

Our Commitment

Life Care supports and encourages the voluntary participation of associates in the political process, as they desire. This is one of every American's most basic rights.

SPOTLIGHT: Lobbying



Lobbying is the process where interest groups or lobbyists attempt to influence public policy through contacts with public officials. At times, Life Care may ask certain managers to contact members of government and other officials, in full compliance with applicable lobbying laws, to advocate for the Company's position on issues. Life Care may periodically engage lobbyists or lobbying firms to help promote its interests, according to established internal controls to assure that all activities are legal.

No associate should ever engage in lobbying, or engage anyone else to act as a lobbyist, without prior authorization from the Chief Executive Officer.

What to Know

- Federal and state laws limit the nature and extent of individual and organizational political participation.
- Associates may make personal political contributions or communicate their personal beliefs to elected officials, as long as it cannot be viewed as coming from Life Care.
- Federal law prohibits reimbursement of individuals for their personal political contributions.
- Organizational political activities differ from those that are personal. Life Care may occasionally speak out on issues of importance.

What to Do

- **Use your own time and resources.** Your political activities must not interfere with your responsibilities at Life Care. Company resources

such as copiers, phones, computers, and offices must never be used for your political activities.

- **Speak and act on your own behalf.** Ensure that your personal political views and activities are not viewed as those of the Company. Unless specifically authorized to represent Life Care, clearly label any personal communication with legislators as your own.
- **Refer inquiries about Life Care's political position.** If you are contacted by legislators or regulators regarding Life Care's position on public issues, you should refer them to your supervisor or the Public Relations department.



WHERE TO FIND MORE

- Associate Handbook

HOW TO LIVE IT

Q Elections are coming up, and in order to vote, I need to go to the polling place during work hours. Is this allowable?

Yes. Associates are expected to schedule their voting time so as not to interfere with work time, but in instances where work schedules may interfere with your ability to vote either before or after work, you will be given reasonable time off to vote in accordance with state law. You must give your supervisor notice of your need for leave for this purpose prior to election day.

A

Q A political candidate that I support has added elder care issues to his political platform. He wants to hold a rally in town and is looking for someone to donate the location. Would Life Care be willing to host this in one of their buildings?

No. Life Care encourages its residents and patients to exercise their right to participate in the election process and encourages elected officials and candidates to visit our facilities to meet with them. However, the Company believes it would be improper to host a rally for a candidate seeking election or reelection or allow them to solicit donations from our residents, patients, their families, or associates at our facility.

A



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OUR COMPLIANCE AND ETHICS PROGRAM

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OUR COMPLIANCE AND ETHICS PROGRAM

Our Commitment

Life Care is committed to conducting its business ethically and with integrity. This includes preventing and detecting fraud and abuse and complying with all state and federal laws that apply to our jobs and our business to deliver quality care to our residents and patients. Life Care designed and implemented a Compliance and Ethics Program (Program) to promote and support ethical and legal conduct and a culture of integrity through accountability to a system of compliance and ethics standards.

- Written standards of conduct, policies, and procedures;
- Education and training programs for all affected persons;
- Open lines of communication including reporting mechanisms, such as EthicsPoint;
- Monitoring and auditing to identify and reduce problems;
- Prompt investigation and response; and
- Enforcement of appropriate corrective action.

What to Do

- **Comply with Life Care’s standards, rules, and requirements.** Uphold our Code, complete all required training on a timely basis, cooperate with investigations and audits, speak up to Company resources with ethics or compliance questions or concerns, and never retaliate.
- **Report potential or actual misconduct.** The Company provides many resources to help you with your concerns.
- **Avoid consequences of non-reporting.** Failure to report known or suspected wrongdoing may itself result in disciplinary action against those who failed to report the incident.

SPOTLIGHT: External Reporting



In addition to Life Care’s internal reporting mechanisms, associates and others who have concerns about the safety or quality of care provided may report these concerns to an appropriate federal or state agency. In these instances, the reporters must not be the subject of retaliation, retribution, or harassment by Life Care, any of its associates, or anyone else who must uphold this Code.

What to Know

The Program includes the following elements:

- Risk assessment to identify compliance, ethics, and reputational risks and evaluate the strength of related internal controls;
- Oversight by a Chief Compliance Officer supported by a Compliance department and a Compliance Advisory Board comprised of senior leaders;



WHERE TO FIND MORE

- Compliance department policies

LIFE CARE RESOURCES

Life Care provides several resources to help you speak up. Raising concerns is the right thing to do even if you are unsure if the issue is a problem.



Your Supervisor

He or she can answer your questions and help you decide the best course of action in most situations – or connect you to other Company resources that can.



Another Supervisor in Your Chain of Command

For issues involving your supervisor or if you are uncomfortable speaking to him or her, speak to another supervisor in your reporting chain or another leader with whom you feel most comfortable.



Human Resources Department

For a human resources or general workplace issue that you are unable to resolve with your supervisor, contact your facility human resources manager, division human resources director, or the corporate Human Resources department.



Legal and Risk Services Department

For any legal issues that arise such as contacts by law enforcement, notice of investigations, or receipt of subpoenas, contact the Legal and Risk Services department.



Information Technology Customer Support Center

For suspected violations of Life Care's network or computer systems, call the Customer Support Center.

- Outside of the Cleveland, Tennessee, calling area - (800) 275-LCCA x5222
- Within the Cleveland area - (423) 339-8313



Privacy Officer

If you have a question or concern about an actual or suspected HIPAA Privacy issue, please contact Life Care's Privacy Officer at (423) 473-5554 or at privacy_officer@lcca.com.

COMPLIANCE DEPARTMENT

Questions or concerns also may be reported directly to the Compliance department in one of the following ways:



Use Life Care's confidential disclosure system, EthicsPoint, to provide a description of the issue.

- Call the toll-free hotline (without caller-ID) at 1-877-423-8305; or
- Use the internet: www.LCCA.ethicspoint.com
- EthicsPoint is available 24/7/365 and managed by a third-party vendor.
- If you choose to submit an anonymous report via EthicsPoint, a six-digit case number will be provided so you may later submit more information related to your original report. This also allows the Compliance department to communicate with you (e.g., ask questions) and still protect your anonymity. No one at Life Care has access to your case number.
- You may also submit a report including your name but request anonymity. If you do so, your anonymity will be protected up to the limits of the law.
 - Translation services are available for both written and verbal reports.



Fax a written description of the matter.

1- (423) 339-8318



Email:

compliance_department@lcca.com



Mail a written description of the matter.

Chief Compliance Officer
Life Care Centers of America, Inc.
3001 Keith St. NW
Cleveland, Tennessee 37312

FINAL MESSAGE



Thank you for reading our Code. We have designed it to outline what is expected from all of us, and as a useful resource when you have questions or are unsure what to do in a difficult or questionable situation. Remember, however, that you do not have to tackle problems on your own. All the resources listed in the Code are ready to help when you need them. Please feel free to contact the Compliance department if you have any questions or concerns.

Our residents and patients count on us to always do the right thing and give them the best quality care. Their trust in us reinforces our continuing commitment to serve.

A handwritten signature in black ink that reads "Wayne T. Griffin, Jr.".

Wayne T. Griffin, Jr.
Senior Vice President - Compliance
Chief Compliance Officer

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