UNITED CHURCH HOMES, INC.

STANDARDS OF CONDUCT
# Table of Contents

A. Message from the President .......................................................... 3
B. Mission, Vision and Values: Standards of Conduct ........................................ 4
C. Quality of Care ............................................................................. 5
D. Health & Safety ............................................................................ 6
E. Protection of Property ..................................................................... 7
F. Human Resources ........................................................................ 8
G. Compliance with Laws and Regulations ............................................... 9
H. Billing & Coding ........................................................................... 10
I. Conflicts of Interest ......................................................................... 11
J. Ethical Behavior is Everyone's Concern ............................................. 12

Affirmation of Compliance ................................................................... 13
A Higher Standard

When you become an employee of United Church Homes, you are joining an organization with over 100 years of history and a national reputation for excellence in serving seniors.

This is no accident. Over the years, we have developed an organizational culture that emphasizes quality. This commitment begins at the top of our organization with our Board of Directors who insists that we uphold our reputation and our organizational integrity in the way we run our business, care for our residents, and do our individual jobs.

The Standards of Conduct summarizes the essential elements of our personal and professional responsibility in doing our work not only in compliance with the policies and practices, but also within the Mission, Vision, and Values of United Church Homes.

We expect each employee to do his or her job with a sense of ethical integrity that above all "does the right thing" for our residents. In addition, we are responsible to follow all company policies and state and federal regulations.

Our Standards of Conduct is the foundation for what is to guide our daily decision-making as employees whether our work is at the bedside, in an office, serving a meal, performing a clinical service, talking to a referral source, preparing a bill, asking for donations, or any other of the myriad of tasks that we do individually and collectively day in and day out.

These standards will not cover every situation that you may face. However, these guidelines should help you decide where to go for assistance if you have questions or concerns, talk to your supervisor whenever you have a question. Be assured that no employee may ever be disciplined in retaliation for reporting a concern or suspected violation of our Standards of Conduct.

Compliance with these Standards of Conduct is an essential job expectation for everyone at United Church Homes. Together we can assure that United Church Homes continues to build on its rich tradition of integrity, excellence, and trust that people across the country have come to expect of us. Thanks for all you do to keep our reputation among the best in the business.

Sincerely,

Rev. Kenneth V. Daniel

President & Chief Executive Officer
Our Vision
United Church Homes: Where the Spirit creates Abundant Life in Community

Our Mission
is to transform Aging by building a culture of community, wholeness, and peace.

Our Core Values
Compassion: Shine and reflect God’s love.
We believe demonstrating God’s love through active listening, gentle touch and gracious presence honors the humanity of the people we serve.
I Corinthians 16:14 "Let all that you do be done in love."

Hospitality: Welcome everyone.
We believe working to help all feel safe and at home builds a diverse community which we imagine to be radically open and inclusive of everyone.
Hebrews 13:2 “Do not neglect to show hospitality to strangers, for by doing that some have entertained angels without knowing it."

Respect: Honor the differences among us.
We believe honoring the experience and perspective of others releases the richness of the gifts within our community.
I Peter 2:17b “Treat everyone you meet with dignity and respect. Love your spiritual family. Revere God."

Integrity: Walk the talk.
We believe acting with the courage of our convictions builds trust and aligns our actions with our values.
Proverbs 10:9a “Whoever walks in integrity walks securely.”

Stewardship: Use our resources wisely.
We believe using all God’s gifts wisely advances the well-being of others and equips us to serve the common good.
I Corinthians 4:1-2 “Think of us in this way, as servants of Christ and stewards of God’s mysteries. Moreover, it is required of stewards that they be found trustworthy.”

Transparency: Be honest and open in all we do.
We believe living by a high ethical calling empowers us to be agents of transformation and to grow in excellence.
Luke 8:15 “But some people hear the message and let it take root deeply in receptive hearts made fertile by honesty and goodness. With patient dependability, they bear good fruit.”
C. QUALITY OF CARE

UCH, through its directors, officers, employees and vendors is committed to providing quality care and services to our residents, their families, their significant others, and the communities we serve.

A. We respect the residents’ dignity, comfort and convenience and will treat each resident with consideration, courtesy and respect. We will provide an environment where residents are safeguarded from abuse.

B. We protect the privacy of our residents; and any unauthorized disclosure of any resident information is strictly forbidden.

C. We provide quality care and services without regard to race, color, creed, national origin, religion, gender, sexual orientation, gender identity and/or expression, age, disability, genetic information or ancestry.

D. We ensure residents are adequately informed about treatment alternatives and the various risk factors.

E. We encourage open and honest communication with our residents and their families, recognizing their right to informed consent and the right to refuse treatment in accordance with applicable law.

F. We employ properly screened, licensed and credentialed providers with proper expertise and experience to care for our residents.

G. We act in ways that promote trust, confidence, and respect of residents and their families, staff members, volunteers, donors, visitors, community members, vendors, external organizations and the general public.
D. HEALTH & SAFETY

We are committed to providing our residents, staff members, volunteers, donors, visitors, and community with a reasonably secure and safe environment in which to work, visit, live, and provide services.

A. We take required precautions and follow safety rules and regulations to promote and maintain a safe environment for our residents, staff members, volunteers, donors and visitors.

B. We are committed to a drug-free and alcohol-free working environment for our staff and volunteers. The manufacture, distribution, possession or consumption of alcohol or drugs, or reporting to work in an impaired condition is strictly prohibited. Over-the-counter and physician prescribed medications being taken according to direction are acceptable so long as the staff member is able to carry out their job responsibilities in a safe and reliable manner.

C. We promptly report any accidents involving injury to residents, staff members, volunteers, or visitors through the incident reporting system.

D. We act responsibly in the handling and disposal of hazardous substances and infectious waste.
E. PROTECTION OF PROPERTY

We are committed to protecting our property, and the property entrusted to us, against loss, theft or misuse. Property includes physical assets, funds, proprietary information and intellectual property.

A. We respect and take reasonable steps to safeguard the property of residents, staff members, volunteers, donors, family members, and visitors.

B. We productively use the time paid for by United Church Homes.

C. We ensure medications, food and supplies are safely stored, secured, and inventoried. Missing items are promptly reported.

D. We do not tolerate theft, embezzlement, or financial misconduct involving our property or the property of residents, staff members, volunteers, donors, family members, and visitors.

E. We do not permit making unauthorized copies of corporate documents, proprietary information, copyrighted printed materials or computer software. We will not use personal software on UCH computer equipment.

F. We do not communicate or transfer any information or documents to any unauthorized persons.

G. We will promptly report any damage, loss, theft or misuse of resident and/or UCH property through UCH's Incident Reporting System.

H. We will safeguard the security of our data systems and protect the privacy of our residents and employees personal health or financial information.
F. HUMAN RESOURCES

We are committed to protecting, supporting and developing all staff members.

A. We provide a work environment for all staff members free from harassment and intimidation. Harassment is defined as physical or verbal conduct that offends or is hostile toward a staff member.

B. We do not discriminate against individuals based upon race, color, creed, national origin, religion, gender, sexual orientation, gender identity and/or expression, age, disability, genetic information or ancestry.

C. We encourage staff members to evaluate existing methods of delivering services in order to discover more effective ways of allocating the resources for resident care and support services.

D. We endeavor to maintain open lines of communication so the views of each staff member may be considered and their concerns properly addressed.

E. We show respect and consideration for one another.

F. We use all forms of social media ethically and responsibly.

G. We do not tolerate retaliation for reporting of fraud, abuse or other violations of UCH’s policies, practices or of the law.
G. COMPLIANCE WITH LAWS & REGULATIONS

We carry out our mission and conduct our business in accordance with applicable laws, regulations and professional standards in order to promote a culture of integrity and high ethical standards.

A. We maintain resident, staff member, system and other information in a confidential manner and will not share or access information in an unauthorized manner. Sensitive information concerning personnel and management processes will be maintained in the strictest confidence and utilized only by authorized individuals.

B. We conform to applicable laws, regulations, standards and other compliance requirements at all levels of government.

C. We maintain complete and accurate resident medical records and maintain confidentiality as provided by applicable laws.

D. We ensure agreements with individuals or organizations that provide a formal referral source are in writing and approved by appropriate management or legal counsel.

E. We do not provide kickbacks, rebates or anything else of value in order to influence the referrals of residents or services payable by a government health care program.

F. We conduct marketing practices with truth, accuracy and responsibility to residents, their family members, and the general public.
H. BILLING & CODING

We are committed to fair and accurate billing in accordance with federal and state laws and regulations.

A. We bill only for services actually provided, documented in the residents' medical records, and medically prescribed.

B. We do not knowingly submit for payment or reimbursement a claim we know to be false, fraudulent or fictitious.

C. We assign billing codes that accurately reflect the services and products provided.

D. We do not permit the premature destruction or alteration of any document in response to, or in anticipation of, a request for those documents by any government agency or court.

E. We regularly review our records for credit balances and promptly refund any overpayments.

F. We do not routinely waive insurance co-payments or deductibles.

G. We conduct collection/credit procedures according to applicable law.

H. We regularly audit and monitor our billing and coding practices.
I. CONFLICTS OF INTEREST

United Church Homes’ employees, independent contractors, volunteers, and board members are expected to refrain from and avoid conflicts or the appearance of conflicts between their private interests and those of United Church Homes.

A. We do not pursue any activity that might conflict, or appear to conflict, with the interests of the organization.
   A conflict exists whenever a staff member, independent contractor, volunteer, board member or a related party (e.g., family member, friend or business associate) may receive a benefit from any decision or action taken.

B. We exercise good faith and fair dealing in all transactions that involve our responsibilities to the organization.

C. We do not use our position for personal gain.

D. We only accept or provide gifts in accordance with United Church Homes’ policies.

E. We follow the United Church Homes Conflict of Interest Policy and disclose any potential conflicts of interest or commitment to management or administration in accordance with that policy.
J. **ETHICAL BEHAVIOR IS EVERYONE’S CONCERN**

To provide employees with multiple avenues to raise concerns and report potential wrongdoing, United Church Homes has established a compliance email: [compliance@uchinc.org](mailto:compliance@uchinc.org) to compliment our existing ANONYMOUS Corporate Compliance Hotline (1-877-631-5721).

If you are concerned about a potential ethical or legal compliance issue at United Church Homes, please take the following steps of action:

- Speak with your supervisor or manager; or
- Speak with the director of your department; or
- Speak with the Vice-President of your area; or
- Speak with the Corporate Compliance Officer using the Corporate Compliance Hotline.

**1-877-631-5721**
**Corporate Compliance Hotline**
**OR**
**Email: compliance@uchinc.org**

Si usted habla español, por favor llámenos
1-800-297-8592

*United Church Homes prohibits any form of retaliation for reporting a concern.*
I have received and reviewed a copy of United Church Homes, Inc.’s Standards of Conduct as part of my compliance training, and I understand and acknowledge United Church Home’s expectations of me. I have also had the opportunity to ask questions and discuss any aspects of the Standards of Conduct.

I understand I have the duty to promptly report all violations and suspected violations of United Church Home, Inc.’s standards of conduct, questionable conduct, or questionable practices to my immediate supervisor. I understand that I also have the option of reporting violations and suspected violations by the following means: (1) reporting to the next supervisor in United Church Home, Inc.’s chain of command, or (2) reporting directly to the Compliance Officer at 1-877-631-5721 or via email to compliance@uchinc.org. I also understand that there will be no retaliation for reporting violations.

I also acknowledge that the standards of conduct do not alter my employment arrangement which is on an "at-will" basis as described in the Employee Handbook. I understand that failure to follow United Church Homes, Inc. policies and procedures can result in disciplinary actions, up to and including termination.

___________________________________________________
Employee

___________________________________________________
Date