

Regulatory Excellence

We are obligated to follow federal, state and local laws that govern our business and are responsible for learning and staying current on these laws to fulfill our job responsibilities.

Our Responsibilities

- Commit to honest and ethical billing and communications
- Avoid any kickbacks for referrals
- Avoid inducements
- Respect copyright laws
- Operate with standards of financial practices and controls
- Deal fairly with all whom we come in contact
- Document with integrity and accuracy
- Voluntarily disclose when we find we are out of compliance
- Cooperate with government investigations.

Any team member who fails to act in accordance with the Standard of Conduct, the compliance and ethics program, supporting policies and procedures and applicable federal and state laws will face disciplinary action.

Our success depends on your commitment to act with integrity, both personally and professionally.

A Personal Obligation

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

Three-Step Reporting Process

1. Talk to your supervisor. This person is most familiar with laws, regulations and policies that relate to your work.
2. If you are unable to talk to your supervisor, seek out another member of the leadership team or contact Human Resources.
3. If you still have a concern, contact the Compliance Official or a member of the SpiriTrust Lutheran Compliance Committee.

If none of these actions resolve your issue, call the

Compliance Hotline

800.211.2713

Calls are confidential and you may remain anonymous, if you choose.

Karla Dreisbach
Vice President of Compliance FSA
670 Sentry Parkway | Suite 120 | Blue Bell, PA 19422
Phone: 215.646.0720 | Fax: 215.646.0724

Standard of Conduct



SpiriTrust Lutheran® Standard of Conduct

Our Compliance and Ethics program covers the compliance issues, laws, regulations and guidelines that are relevant to a provider of senior services provided at our Life Plan Communities.

Our Standard of Conduct is a shared responsibility that applies to every person at every level of our organization. This includes team members, boards of directors, volunteers, independent contractors, subcontractors and vendors who may provide or are involved with healthcare or billing.

As you read this summary of our Standard of Conduct, we use the term, team member, to include all team members, vendors, contractors, volunteers, directors and officers providing care and services at SpiriTrust Lutheran®.

Policies and procedures support and guide our Standard of Conduct. Direct any questions regarding our Standard of Conduct or our policies and procedures to your immediate supervisor, the Compliance Official, any member of the Compliance Committee or the Compliance Officer.

For a copy of the entire Standard of Conduct, please visit our website at www.SpiriTrustLutheran.org or contact Compliance Official **Liz Keller** at 717.217.3502/EKeller@spiritrustlutheranhc.org.

Care Excellence

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

Applicable Rules & Regulations

- Honor resident rights
- Report abuse and neglect to your supervisor immediately. We have zero tolerance for abuse and neglect. Any team member who abuses or neglects a resident is subject to termination, as well as legal and criminal action.
- Maintain confidentiality of all resident information
- Respect and protect resident property to prevent loss, theft, damage and misuse
- Provide quality care
- Accurate assessments and care planning
- Provide only medically needed services
- Use current practice standards
- Document with accuracy in a timely manner
- Measure clinical outcomes
- Assure our workforce has appropriate experience and expertise to provide services
- Implement Quality Assurance Performance Improvement programs to improve outcomes
- Commit to comprehensive medically needed services. The medical director will have oversight of physicians and other medical services for our life plan residents.

Professional Excellence

The professional, responsible and ethical behavior of every team member reflects on the reputation of our organization and the services we provide. Whether you work directly with residents, or in other areas that support resident services, we expect you to maintain our standards of honesty, integrity and professional excellence every day.

Our Standards

- Hire the best qualified team members regardless of race, color, age, religion, national origin, gender identity, sexual orientation or disability
- Screen team members
- Make the workplace a safe, ethical and comfortable environment, including a workplace free of substance abuse
- Assure company privacy and proprietary information is kept confidential
- Follow business courtesies and resident gift policies
- Report any actual or potential conflict of interests
- Use property appropriately and respect property and copyright laws
- Ensure appropriate use of computers to eliminate improper or unlawful activity, downloads or use of games on agency computers
- Be responsible as an organization to have honest and ethical vendor relations
- Assure truth in our marketing and advertising