

Regulatory Excellence

We are obligated to follow federal, state and local laws that govern our business. We are all responsible for learning and staying current in order to perform our job responsibilities.

Including

- Committing to honest and ethical billing and communications
- Avoiding any kickbacks for referrals
- Avoiding inducements
- Respecting copyright laws
- Operating with standards of financial practices and controls
- Dealing fairly with all who we come in contact with
- Integrity and accuracy of all documentation
- Voluntarily disclosing when we find we are out of compliance
- Cooperating with government investigations.

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

Our success depends on your commitment to act with integrity, both personally and as part of our organization.

A Personal Obligation:

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

Three Step Reporting Process

First, talk to your supervisor. He or she is most familiar with laws, regulations and policies that relate to your work.

Second, if you are unable to talk to your supervisor, seek out another member of the management team or Human Resources.

Third, if you still have a concern, contact the Compliance Official or a member of the organization's Compliance Committee.

If none of these resolve your issue you may call the

COMPLIANCE LINE:

800-211-2713

Your calls are confidential and you may call **ANONYMOUSLY** if you choose.

Karla Dreisbach
Vice President of Compliance
Peace Church Compliance Program
670 Sentry Parkway
Suite 120
Blue Bell, PA 19422
Phone: 215-646-0720



Peace Church Compliance Program

Code of Conduct

KENDAL[®]
on Hudson
Together, transforming the experience of aging.[®]

1010 Kendal Way
Sleepy Hollow, NY 10591

Code of Conduct for Kendal on Hudson

Kendal on Hudson is a Continuing Care Retirement Community.

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

Our Code of Conduct is a shared responsibility that applies to every person at every level of our organization. This includes employees, the board 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 Code of Conduct, the word Team Member will be used. This term includes all employees, vendors, contractors, volunteers and directors and officers providing care and services here at Kendal on Hudson.

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

For a copy of the entire Code of Conduct, please visit our website at www.kohud.kendal.org or contact your Compliance Official:

Karen Harvatin
Health Services Administrator
kharvatin@kohud.kendal.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.

Including

- Honoring Resident Rights
- 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. Abuse and neglect are to be reported to your supervisor immediately.**
- Maintaining confidentiality of all resident information
- Respecting and protecting resident property to prevent loss, theft, damage and misuse
- Providing Quality Care
- Accurate assessments and care planning
- Providing only medically needed services
- Using current practice standards
- Accurate and timely documentation
- Measuring clinical outcomes
- Assuring our workforce has appropriate experience and expertise to provide services
- Quality Assurance Performance Improvement programs to improve outcomes
- Committing to comprehensive medically needed services. The Medical Director will have oversight of physicians and other medical services.

Professional Excellence

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

Including

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