

CODE OF CONDUCT

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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 to perform our job responsibilities including:

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

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 Liaison or a member of the organization's Compliance Committee.

If none of these resolve your issue, call the **COMPLIANCE HOTLINE • 800-211-2713**

Disciplinary action will be taken against any Associate who fails to act in accordance with the Code of Conduct, the compliance 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.

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



Kidron Bethel Village
Linda Peters
Executive Director/Corporate Compliance
3001 Ivy Drive, North Newton, KS 67117
316-836-4863

Schowalter Villa
Sharon DeBliek-Anderson, BSN, RN
Corporate Compliance Officer
200 W. Cedar, Hesston, KS 67062
620-327-3427

Peace Church Compliance Program



Professional Excellence

The professional, responsible and ethical behavior of every Associate 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 every day, 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 Gifts policy and the No-Tipping policy
- 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 communities' computers
- Being responsible, as an organization, to have honest and ethical vendor relations, assuring truth in our marketing and advertising.

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 Associate who abuses or neglects a resident is subject to termination as well as legal and criminal action. Abuse and neglect are to be immediately reported to your supervisor.
- 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
- Implementing Quality Assurance programs to improve outcomes
- Committing to comprehensive, medically needed services. The Medical Director will have oversight of physicians and other medical services.

Code of Conduct for Bluestem Communities

The Bluestem Communities of Kidron Bethel Village and Schowalter Villa are continuing care retirement communities. Our compliance program covers the compliance issues, laws, regulations and guidelines that are relevant to providers 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 organizations. 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 "Associate" will be used. This term includes all employees, vendors, contractors, volunteers and directors and officers providing care and services at the Bluestem Communities of Kidron Bethel Village and Schowalter Villa.

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 liaison or any member of the Compliance Committee or the Compliance Officer.

For a copy of the entire Code of Conduct, please contact your Compliance Liaison:

Kidron Bethel Village

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Campus Compliance Officer
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Phone: 316-836-4863 • Fax: 316-284-0173

Schowalter Villa

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