



## Code of Conduct for the Community at Rockhill

The Community at Rockhill is a Life Plan Community. Our compliance 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, 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 the Community at Rockhill.

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

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

Kristin Thim

Phone: (215) 257-2751, ext. 2126

Fax: 215-257-0584

[kthim@communityatrockhill.org](mailto:kthim@communityatrockhill.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, which includes:

- 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 of care
- Accurate assessment 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 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 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, which includes:

- 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 comfort-able 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
- 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

### **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, which includes:

- 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 who we come in contact
- 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 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 at 800-211-2713. Your calls are confidential and you may call anonymously if you choose.

### **Peace Church Compliance Program**

Karla Dreisbach, Senior Director of Compliance  
Peace Church Compliance Program  
670 Sentry Parkway  
Suite 120  
Blue Bell, PA 19422-2325  
Phone: 215-646-0720 / Fax: 215-646-0724



## The Community at Rockhill Compliance Program Plan

Our Compliance Program Plan covers the compliance issues, laws and regulations and guidelines that are relevant to a provider of senior services including Senior Living Communities that may provide a wide range of healthcare services. This includes but is not limited to Medicare and Medicaid regulatory issues, guidelines from the Office of Inspector General, Internal Revenue Service and the Office of Civil Rights of the Department of Health and Human Services, Occupational Safety and Health Administration as well as other regulatory and business issues.

The term “Team Member” defines the various individuals who are associated with the Community at Rockhill. All individuals, including employees, vendors, contractors, volunteers, directors and officers are members of our team in providing care and services to our residents.

The scope of the program includes:

- Policies and procedures that guide our organization in appropriate business practice and promote compliance with laws and governmental regulations;
- Recommendations and resources for training programs which are mandatory for Team Members to ensure understanding of the Code of Conduct;
- Distribution of a copy of the Code of Conduct to all Team Members and a written acknowledgment of its receipt by the Team Member;
- Structures that include appropriate disciplinary monitoring and review of potential fraud and abuse issues conducted to identify need for corrective action as well as additional training;
- Mechanisms established to provide Team Members with means to report potential noncompliance issues or other areas of concern without fear of retribution;
- A process for corrective action that includes appropriate disciplinary measures, to address any issues of noncompliance;
- Guidelines that have been developed for prevention of, and when required, response to identified compliance issues. This includes an annual review of the Compliance Program and modifications to the Program as appropriate;



- Designation of a Compliance Officer and other appropriate bodies such as a Compliance Committee charged with the responsibility for developing, operating and monitoring the Compliance Program within the organization.

Any questions regarding the policies in this Code of Conduct or references should be directed to your immediate supervisor, the Compliance Official or member of the Compliance Committee or the Compliance Officer.

The Community at Rockhill is a Life Plan Community that provides a continuum of care including residential, personal care and health care environments. This Code of Conduct applies to every person at every level of the organization. This includes employees, board of directors, volunteers, independent contractors, subcontractors, and vendors who may provide or are involved with healthcare or billing. The term “Resident” refers to individuals who receive the various types of health care, and other services that we provide.

The Community at Rockhill is a Life Plan Community licensed under the Pennsylvania Department of Health, Pennsylvania Department of Public Welfare and PA Department of Insurance.

The [CODE OF CONDUCT](#) is supported by the policies and procedures.