



# CODE OF CONDUCT

*Code of Conduct*

## Highlights

## Policy Statement

UMRC has a reputation for conducting itself in accordance with business and community ethics and in compliance with applicable laws, rules and regulations. UMRC recognizes the problems that both deliberate and accidental misconduct in the provision of long term care can cause. UMRC intends to promote full compliance with all legal duties applicable to it, foster and assure ethical conduct and provide guidance to each employee and agent of UMRC for his/her conduct.

This Code of Conduct contains the Principles underlying the policies of UMRC. It provides guidance to all individuals providing services to, or on behalf of UMRC. All employees of UMRC are required to follow all of the UMRC policies and procedures. All employees are obligated to incorporate the Code of Conduct into their daily performance. All employees are responsible for ensuring that their behavior and activity are consistent with the Code of Conduct.

### Policy Interpretation and Implementation

The Code of Conduct will be reviewed regularly, updated and distributed as required.

- A. UMRC will strive to ensure that all activity by or on behalf of the corporation is in compliance with applicable laws.
- UMRC will make efforts to ensure that all statements, communications, and representations of its employees are accurate, complete, truthful and in compliance with applicable laws and regulations.
  - UMRC employees shall perform their duties in a manner that promotes public trust.
  - UMRC shall not knowingly pursue any business activity that requires engagement in unethical or illegal activity.
  - UMRC will, to the best of its knowledge and understanding, ensure that all reports or other information required to be provided to any federal, state, or local government agency is filed accurately and in conformance with the applicable laws and regulations governing such reports or information.
- B. UMRC is committed to conducting business with high standards of business ethics and integrity.
- UMRC will take reasonable precaution to ensure that its billing and coding are in compliance with relevant policies, federal and state laws and regulations.
  - UMRC will not knowingly file a claim containing information known to be false.
  - UMRC will take steps to ensure that payments and other transactions are properly authorized by management and properly documented in the books and records.
  - UMRC will transact business with health care professionals in a fair, ethical, and lawful manner.



- C. UMRC employees, agents and contractors shall demonstrate a commitment to quality. UMRC employees, agents and contractors shall strive to provide high quality care.
- UMRC shall provide appropriate care based on medical need, without regard to race, religion, national origin, age, sex, disability, ability to pay, or any classification protected by law.
  - UMRC will provide care consistent with its policies and procedures.
  - UMRC will respect and maintain the dignity of every resident and strive to provide care in a manner sensitive to cultural differences and individual desires.
  - UMRC will encourage employees, agents, and contractors to report through the appropriate channels and when possible, correct situations that compromise the provision of quality care.
  - UMRC employees, agents and contractors have access to a variety of confidential, sensitive, and proprietary information. Inappropriate use of this information could be harmful to the residents, employees, their families and the corporation. Every UMRC employee, agent and contractor has the obligation to actively protect and safeguard confidential, sensitive, and proprietary information in a manner designed to prevent the unauthorized disclosure of this information.
- D. UMRC employees owe a duty of loyalty to the corporation. Employees, agents, and contractors are prohibited from using their position with UMRC, or knowledge obtained through their position, to profit personally or to assist others in profiting at the expense of UMRC.
- All UMRC employees, agents and contractors are expected to avoid conflicts of interest, actual impropriety and/or influence of outside activities on business decisions of UMRC or from the disclosure or private use of business affairs or plans of UMRC.
  - Loans to employees from vendors doing business with UMRC are prohibited.
  - Financial and in-kind donations to and sponsorship of UMRC can be accepted only by the President and Chief Executive Officer of UMRC or the Executive Director of the UMRC Heritage Foundation or their designees.
  - Disclosure of proprietary and sensitive information to any unauthorized person or the use of such information for personal benefit is prohibited.
  - Employees are expected to adhere to proper business practices and federal and state anti-fraud and referral prohibitions in dealing with vendors or referral sources.
  - UMRC employees will strive to preserve and protect UMRC's assets by making wise and effective use of UMRC resources and by accurately reporting its financial condition.
- E. UMRC employees will promptly notify their supervisor, department head, Administrator, other appropriate high level employee or the Compliance Officer of any possible violations of law or improper activity by its employees, agents and contractors.
- UMRC employees have an affirmative duty to report problems or concerns.
  - Employees will make reports to the Compliance Officer via one of the methods described in the Corporate Compliance Plan.



- UMRC will discipline employees who have knowledge of problems but who do not report these possible violations of law or improper activity.
- UMRC will not directly or indirectly retaliate against an employee or any individual who makes reports regarding possible violations of law or improper activity.

Regulatory Reference Sources and Revision Dates	
<b>OBRA Regulatory Reference Numbers</b>	None Applicable
<b>Survey Tag Numbers</b>	None Applicable
<b>Policy Created/ Revised</b>	Date:9/25/2007                      By: _____ Date: 05/06/12 _____      By: John Thorhauer ___ Date: _____                      By: _____ Date: _____                      By: _____