



Willow Point Nursing Home Corporate Compliance Program SPEAK UP! WE'RE LISTENING

CODE OF CONDUCT

Assets: All assets of the organization shall be used solely for the benefit and purpose of Willow Point Nursing Home and the residents residing in the facility. Personal use of Broome County assets is not allowed.

Billing: Claims are submitted for services rendered only when the organization has reason to believe the said services are reasonable and medically necessary. Documentation to support billing claims will be maintained as required by law.

Bribes, Gifts and Gratuities: No person associated with the organization shall accept bribes, gifts, or gratuities intended to persuade business decisions, solicit an unfair advantage, or reward special attention or service. There will be no loans to or from, any individual or business (other than recognized financial institutions) that furnish or receive supplies or services to Willow Point Nursing Home.

Cash and Bank Account: No person with access to cash and/or bank accounts shall steal or otherwise misappropriate funds of the organization or funds of the residents. All internal control procedures shall be adhered to at all times.

Competition (Antitrust): The organization shall not participate in any venture with other organization(s) that collaborate on information and/or services intended to eliminate fair competition or to engage in price fixing in direct violation of antitrust laws.

Confidential Information: All persons associated with the organization shall respect the confidential nature of resident and organization information, and shall refrain from disclosing or discussing issues of a confidential nature inappropriately. Information obtained through employment or association with Willow Point Nursing Home must not be used to benefit other employees or organizations.

Conflict of Interest: All persons associated with the organization shall disclose any potential conflict of interest and refrain from any activity that represents an unfair business advantage by virtue of their business interest or employment with Willow Point Nursing Home. Employees may hold a second job in addition to employment with Willow Point Nursing Home, as long as it does not affect the employee's performance or represent a conflict of interest.



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Contributions: No person associated with the organization shall use force, coercion or implied retaliation over another person to solicit contributions. No person or persons, employee or otherwise, may solicit any funds from a resident or organized committee or council of the resident(s).

Financial Reports: Expense reports, reimbursement requests, financial statements and cost reports shall be completed thoroughly and accurately. No individual shall willfully or purposely misrepresent any financial reports or reimbursements.

Financing/Loan Agreements: The organization shall maintain a familiarity with the terms, conditions and covenants contained in any financing/loan agreements and shall refrain from engaging in any activity in direct conflict or breach of these terms, conditions, or covenants.

Medicare/Medicaid Anti-Kickback: No individual associated with the organization shall engage in any unlawful acts of accepting payments or benefits in return for generating Medicare/Medicaid business activity.

Non-Discrimination: All persons associated with the organization shall adhere to state and federal laws prohibiting discrimination because of age, race, gender, color, marital status, disability, sexual preference or national origin while conducting business activity of the organization.

Resident Rights: All persons associated with the organization shall adhere to the standards of conduct defined in Willow Point Nursing Home's Resident Bill of Rights.

Research Grants: All individuals associated with an organizational-sponsored research grant shall conduct their activity in accordance with the grant guidelines. All grant funds shall be used only in accordance with the grant approval with documentation to support all grant activity. No resident shall be included in any grant research without the expressed and written approval of the competent resident or the designated representative of the cognitively impaired resident.

Quality of Care: Every resident shall be assessed upon admission, quarterly (no more than every 91 days), annually, and when a significant change in status



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requires review to provide the care and services necessary to attain or maintain “the highest practicable physical, mental, and psychosocial well-being.”

Tax Exemption: The organization shall not engage in any prohibited activity that violates or could result in a challenge of its tax exemption status.