



CODE OF CONDUCT

ALL DEPARTMENTS

Date: Revised –June 2013
Authorized: Frank McGovern
Approved: Frank McGovern

Statement of Principles:

BayWoods of Annapolis (hereafter “the Community”) is committed to managing and delivering quality health care services to seniors while upholding legal and ethical principles governing a responsible and caring workplace. The Community will comply with health care laws, regulations and the Office of Inspector General (OIG) guidelines related to nursing facilities. The Community strives to conduct its business consistent with the highest ethical standards and strives to prevent fraud and abuse.

In order to maintain these standards, the Community works with its employees and vendors to educate them regarding its standards. The Community expects its employees and vendors to obey all applicable laws and regulations and to conduct themselves so as to avoid conflicts of interest. The Community expects its employees to give notice to the Community:

- Within 72 hours of the employee being charged with a crime.
- Within 24 hours of expiration, suspension, or revocation of an employee’s/ contractor’s license/certification to perform their job
- Within 24 hours if there is a proceeding against the employee or vendor to be excluded, suspended, barred, or ineligible for a Federal health care program.

The laws and regulations governing the operation of health care businesses have become exceedingly complicated and complex. To ensure the provision of quality health care in compliance with these laws and regulations, the Community has developed an OIG Compliance Program (“Compliance Program”). A few of these laws are defined in the Attached Appendix. This Code of Conduct and the Community’s OIG Compliance Manual are an integral Part of the Community’s Compliance Program. They apply to all relationships between the Community and other healthcare providers, including physicians and vendors of goods and services.

The OIG Compliance Manual sets forth the Community’s standards, policies and procedures regarding compliance with the applicable laws and regulations relating to financial relationships among health care providers or other potential sources of business referrals. It is designed to ensure that the Community’s business and billing practices comply with applicable laws and regulations.

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It is the Community's Policy to adhere to the following:

- We maintain the highest standards of integrity and objectivity in dealing with vendors and service providers.
- We are prohibited from accepting or giving gifts beyond the common business courtesies.
- We shall never offer or accept gifts from a government employee.
- Under no circumstances will we accept or give kickbacks when obtaining or awarding contracts, services, referrals, goods or business.
- We must perform our duties to the best of our abilities while obeying all laws, regulations, policies, and procedures which apply to our workplace.
- We must fully comply with laws, regulations and guidelines applicable to the federal healthcare program.

Improper Payments

Employees shall not engage, either directly or indirectly, in any corrupt business practice, including bribery, kickbacks or payoffs, intended to induce, influence, or reward favorable decisions of any customer, contractor or vendor, or any other person in a position to benefit the Community or the employee in any way. No employee shall make or offer to make any payment or provide any other item of value to another person with the understanding or intention that such payment is to be used for an unlawful or improper purpose.

Business Entertainment and Gifts

Employees may provide and accept ordinary and reasonable business entertainment gifts of nominal value, provided that such entertainment and gifts do not violate the laws of the locale in which the business is transacted and are not given for the purpose of influencing the business behavior of the recipient. In any event, such ordinary and reasonable entertainment and gifts may be given only with the prior approval of the officer, department head, administrator, or executive director for whom the employee works.

Cash and non-cash gifts to physicians are prohibited. Cash gifts to referral sources are prohibited. Non-cash gifts to or from referrals sources of nominal value (e.g. fruit baskets, box of candies and similar gift items) are not prohibited, provided such gifts are not directed to any specific individual and are not given more frequently than annually.

Conflicts of Interest

If an employee or a member of employee's immediate family has a financial interest of 5% or greater or a personal interest with the Community's customers, vendors and competitors, as defined in the employee handbook, the employee will disclose the nature and extent of such relationship to the Community's Compliance Officer. Employees are prohibited from purchasing or selling items to residents or families of residents.

Compliance Reporting

Employees and vendors/contractors have a duty to report any activity or occurrence, which they believe may violate the provisions of the community's Code of Conduct. Reporting shall be done promptly through a report to the Community' via the **compliance hotline at 443-837-1218** or in writing to the compliance Officer or designee selected to receive such reports. Reporting

may be done anonymously. The identity of the reporting person will not be disclosed unless required by a federal agency. The Compliance Officer will provide an annual report to the Board of Director.

Enforcement and Discipline

The Community will consistently enforce the provisions of the Community’s Compliance Program. The Community encourages employees, without fear of retribution, to report any concerns or violations of the Community’s Compliance Program. Violations will be investigated and dealt with in accordance to the Community’s progressive discipline policy, and may include a verbal warning, written warning, suspension, demotion, and/or termination of employment. The steps included in the progressive action are determined by the severity of the problem.

Training

Employees shall participate in scheduled training regarding the Community’s Compliance Program, which will include applicable state and federal laws, regulations and guidelines applicable to federal healthcare programs.

Compliance

The Community is committed to assuring that its business is managed in a fiscally sound basis in accordance with all applicable state and federal laws and regulations, including ensuring appropriate billing codes are utilized for all third party reimbursement.

Safeguards

The Community is committed to maintaining reasonable and appropriate safeguards to ensure confidentiality and privacy of resident health information. Employees shall not disclose resident medical or personal information except in accordance with the Community’s applicable policies and procedures.

I have received, read and understand the BayWoods Code of Conduct. I understand that any breach of this Code of Conduct could result in progressive discipline up to and including possible dismissal from my employment from BayWoods.

Employee Signature

Date

Employee Name (Please Print Legibly)