

Bethany Retirement Living Code of Conduct

Respect for the resident: All residents will be treated with dignity, respect and courtesy. Whenever possible, the beliefs and customs of the residents will be accommodated. Admission, transfer, referral and discharge decisions regarding residents will be based upon medically appropriate and legally permissible factors. Residents and/or their representatives will be provided sufficient information to make informed health care decisions.

Respect for the Bethany Community: All members of the Bethany Community are entitled to be treated with respect, fairness and dignity. Conduct which creates a hostile or discriminatory environment will not be tolerated. In a manner consistent with Bethany's best interest, Bethany will provide equal employment opportunities for all qualified individuals; equitably administer employment policies and practices; and, when consistent with resident needs, accommodate religious or moral values of care givers. Confidential personal information will be released and used only in the manner permitted by Bethany policies and applicable law.

Fair and honest business practices: Bethany will utilize billing practices which are clear, accurate and reflect charges for services actually provided to the resident, third party payers and others financially responsible for Bethany's charges. Questions or complaints regarding Bethany charges or billing statements will be resolved according to Bethany's policies or the procedures outlined in payer contracts. Contracts or arrangements with third parties will be evaluated on the basis of need and merits of the proposed contract or arrangement. Bethany and the Bethany Community will refrain from arrangements which are prohibited under state and federal fraud and abuse laws including the receipt of any inappropriate gifts of value or monetary compensation -i.e., "kickbacks".

Confidentiality of resident and proprietary information: Bethany recognizes the need to maintain resident and other information in a confidential manner. Confidential resident information will only be released or accessed in the manner authorized or permitted by Bethany policies and applicable state/federal law. Bethany's own proprietary information will also be treated as confidential and may not be released without Bethany's consent. The Bethany Community must maintain Bethany's policies and safeguards to prevent the unauthorized release of resident and proprietary information.

Honesty and fairness of information provided to the community: Bethany's communications with the community will be clear and accurate. Marketing and promotional statements and activities will accurately reflect services available at Bethany and the appropriate level of Bethany's licensure.

Conflict of interest: Transactions are to be evaluated on the basis of the Bethany Community's best interests, rather than the personal interest of any one member of the Bethany Community. The Bethany Community must avoid actual or potential conflicts of interest which can arise in situations where personal gain or benefit results from a transaction. All members of the Bethany Community who may receive personal gain or benefit as a result of actions that are in conflict with Bethany interest, outside of agreed upon compensation paid by Bethany, must disclose the conflict to Bethany and obtain Bethany's approval prior to participation in the transaction.

Compliance and reporting of violations: Bethany fosters an environment of open communication so that all members of the Bethany Community understand their obligations to report compliance concerns. Allegations of non-compliance may be reported to any member of the Compliance & Ethics Committee. Allegations of non-compliance may also be reported to any Bethany department director or manager. Reports of violations will be fully investigated and appropriate action taken to assure ongoing compliance with this Code of Conduct. To the extent consistent with Bethany's need to review allegations of non-compliance, requests for confidentiality will be honored.

Anti-retaliation: Bethany will not tolerate retaliation against individuals who report, in good faith, suspected wrong-doings or compliance concerns. All reported allegations of retaliation are fully investigated, and appropriate corrective action taken pending the outcome of the investigation.

Related policies: Bethany has adopted several related policies and procedures which provide specific guidance with respect to ethical issues and conduct. For example, guidance may be found in Bethany's Mission Statement, Personnel Policy Manuals, Administrative Policy & Guidelines Manuals and individual Departmental Policy and Procedure Manuals. Members of the Bethany Community should consult with these references for additional guidance.

For more information or to alert us to a compliance concern, contact Heather Vacha at:

* Office Number: (701) 478-8917

* Compliance Hotline: (701) 239-3591

* Compliance Email Address: compliance@bethanynd.org