

CORPORATE COMPLIANCE

Compliance officer(s):

- Director of Operations
- Director of Clinical Services

Auditing and monitoring the Corporate Compliance Program:

Regular audits of the home health and hospice program will include:

- Clinical Record Reviews
- Policies and Procedures
- Referral Patterns
- Billing Claims and Denials
- Utilization of home health care services
- Contracts
- Patient and Caregiver Satisfaction Surveys
- Visit frequencies

Findings from the audits are presented on a quarterly basis.

Education and Training:

All current and new staff will receive training re: the Corporate Compliance Program and are required to sign a copy of the Standards of Conduct. Mandatory Corporate Compliance education will be provided annually. Standards of Conduct will be signed upon hire and reviewed annually thereafter.

Disciplinary Action:

Disciplinary action is taken against employees who fail to comply with the Standards of Conduct, Policies and Procedures and Healthcare regulations.

Disciplinary action includes verbal and written warnings, probation and/or termination. Immediate suspension or termination of the employee may result when behavior or action includes theft, substance abuse, gambling, failure to notify a supervisor of absence and/or failure to adhere to Standards of Conduct. (See attached policy for specifics.)

Reporting Mechanism:

Employees of Nurses & Company have a responsibility to report any suspected wrongdoings or violations of Standards of Conduct, Policies and Procedures and Healthcare regulations. The employee may report concerns to their immediate supervisor or the Corporate Compliance Officer(s).

CORPORATE COMPLIANCE: COMPLIANCE PROGRAM

POLICY STATEMENT: In an effort to conduct business according to the highest ethical standards and in compliance with federal and state laws and regulations, Nurses & Company maintains a corporate compliance program. The compliance program is designed to identify and prevent potential areas of fraud, waste or abuse and correct any instances of non-compliance.

PROCEDURES:

1. The major components of the compliance program include:
 - a. Written *Standards of Conduct* that guide employees in appropriate business and professional practice.
 - b. Written policies and procedures that addresses the compliance program.
 - c. The designation of Compliance Officer(s) to oversee the maintenance and evaluation of the Compliance Program.
 - d. Mandatory staff education regarding the compliance program and health care regulations.
 - e. A mechanism that allows employees to report instances of misconduct or unethical behavior without fear of reprisal.
 - f. Auditing and monitoring of operations, regulatory compliance and the effectiveness of the compliance program.
 - g. Corrective action including disciplinary measures when instances of misconduct or unethical or illegal activities are discovered.
 - h. A commitment to not hiring individuals or working with business entities that have been sanctioned, debarred or otherwise excluded from participation in federal health care programs.
2. Adherence to the compliance program is a condition of employment for all Nurses & Company employees.

CORPORATE COMPLIANCE: AUDITING AND MONITORING

POLICY STATEMENT: Nurses & Company conducts an ongoing and comprehensive assessment of the quality and appropriateness of services and operations, including monitoring the continued effectiveness of the corporate compliance program.

PROCEDURES:

1. Nurses & Company conducts regular audits of operations in accordance with an audit protocol established by the Performance Improvement Committee.
2. Components of the program that are regularly audited may include but not be limited to:
 - a. Clinical records
 - b. Policies and procedures
 - c. Program statistics
 - d. Referral patterns
 - e. Billing claims and denials
 - f. Utilization of services
 - g. Contracts
 - h. Patient / Caregiver Satisfaction Surveys
 - i. Visit frequencies
3. Components of the compliance program that are regularly reviewed include:
 - a. Standards of Conduct
 - b. Compliance policies and procedures
 - c. Hiring practices
 - d. Reporting mechanism
 - e. Disciplinary actions
 - f. Response and corrective actions
 - g. Auditing and monitoring functions
4. Findings will be presented to the appropriate administrative staff for review.
5. The Compliance Officer(s) provides a summary of audit findings for inclusion in the Home Health Annual Evaluation Report and the Hospice Quarterly Governing Body Meetings.

CORPORATE COMPLIANCE: DISCIPLINARY ACTION

POLICY STATEMENT: Disciplinary action is taken against employees who fail to comply with the Standard of Conduct, Policies and Procedures, or healthcare regulations.

PROCEDURE

1. Disciplinary actions are imposed in a fair and consistent manner regardless of the individual's position within the organization and are appropriate to the nature and severity of the violation.
2. Progressive discipline ensures that employees are apprised of problems and have time to rectify them, and includes:
 - a. *Verbal Warnings:* A verbal warning is the initial discussion between the employee and his or her supervisor about a specific problem or problems that need correction.
 - b. *Written Warning(s):* If the verbal warning was ineffective and problems continue, further discussion takes place and a written warning is placed in the employee's personnel file. A written warning may also be initiated if the problem is significant enough that both the verbal and written warning is presented simultaneously.
 - c. *Probation:* An employee may be notified that he or she is on probation for a specific time period. A detailed performance improvement plan with goals and achievement dates are developed by the employee and his/her supervisor. The plan is monitored as needed.
 - d. *Termination:* Termination of employment may occur if problems with the employee's performance are not resolved.
3. When an employee's actions or behavior includes theft, substance abuse, gambling, failure to notify a supervisor of absence and/or failure to adhere to standards of professional practice or the organization's *Standards of Conduct*, Nurses & Company reserves the right to initiate immediate suspension or termination of the employee's employment. Examples are as follows (the list is not all inclusive):
 - a. Has willfully violated any of the rules, regulations, policies or procedures of Nurses & Company.
 - b. Is incompetent, inadequate, careless, or inefficient in the performance of duties (specific instances to be charged), or has failed to meet established minimum standards in the performance of such duties.
 - c. Has been intentionally careless or negligent in the care of the property of Nurses & Company and/or its patients.

CORPORATE COMPLIANCE: STANDARDS OF CONDUCT

POLICY STATEMENT: The *Standards of Conduct* of Nurses & Company express a commitment to comply with federal, state and private insurer standards and requires ethical conduct and business practices of all employees, contract staff, independent contractors and other significant agents.

PROCEDURES:

1. The Administration revises the *Standards of Conduct* if needed when statutes and/or regulations are modified.
2. A copy of the *Standards of Conduct* is provided to all new employees, contract staff, independent contractors and other significant agents with whom the agency conducts business.
3. All employees are required to certify that they have received, read, and understood the *Standards of Conduct* and a copy of this certification is retained in the personnel record of each employee.
4. Contract staff, independent contractors and other significant agents working with Nurses & Company are expected to adhere to the *Standards of Conduct*.
5. Employees, contract staff, independent contractors and other significant agents have a responsibility to report any conduct or business practices that do not conform to the *Standards of Conduct*.
6. A commitment to follow the *Standards of Conduct* is expected of all individuals who work for or with Nurses & Company.

STANDARDS OF CONDUCT

By accepting employment with Nurses & Company, you have a responsibility to the Agency and to your fellow employees to adhere to certain rules of behavior and conduct. The purpose of these rules is not to restrict your rights, but rather to be certain that you understand what conduct is expected and necessary. When each person is aware that he or she can fully depend upon fellow workers to follow the standards of conduct, then our organization will be a better place to work for everyone.

Commonly accepted standards of conduct help maintain good relationships at work, and promote both responsibility and self-development. You avoid misunderstanding, frictions and other problems by avoiding thoughtless or wrongful acts. In order to provide some guidance concerning unacceptable behavior, the following are examples of types of conduct that are considered impermissible for Nurses & Company employees. If you engage in misconduct or if your performance is unsatisfactory, you may be subject to disciplinary action, up to and including termination. It is impossible to provide an exhaustive list of all types of gross misconduct; therefore the list below is intended simply to provide some examples.

Employees may have other employment or provide a service of compensation as long as no conflict with the necessary duties of Nurses & Company arises. Employees are required to notify their supervisor or administrative staff of this employment/service.

Employees are **PROHIBITED** from:

- Working privately for any Nurses & Company patient.
- Personal telephone calls should be limited and not interfere with the employee's job performance. Use of the patient's telephone for personal calls is prohibited. Personal cell phones must be put on vibrate when entering a patient's home. Employees should refrain from giving personal phone numbers to patients.
- Consuming the patient's food or drink without permission from the patient.
- From residing/living with the patient in either the patient's or the caregiver's residence.
- Smoking in the office and/or in the patients' home or garage.
- Bringing other people to the patient's home.
- Assuming control of the financial or personal affairs or both of the patient or of his/her estate, including power of attorney, conservatorship or guardianship.
- Soliciting or accepting money or goods for personal gain from a patient, taking anything from the patient's home, or purchasing any item from the patient, even at fair market value.

- Using agency time, equipment, facilities, stationary and other supplies for personal matters. Unauthorized possession, removal or use of company or employee property, records or other materials and documents.
- Possessing or bringing weapons, firearms, or ammunition onto company premises or vehicles or whenever representing Nurses & Company.
- Breaching the patient's privacy or confidentiality.
- Personal, non-work related, use of the patient's vehicle.
- Possession, consuming or being under the influence of, alcoholic beverages, or the use of medicine or drugs for any purpose, other than medical, in the patient's home or prior to patient care.
- Committing any act of abuse, neglect or exploitation.
- Discussing the employee's own or other's personal problems, religious or political beliefs with the patient and/or patient's caregiver.
- Speaking with the media, as comments to the media must be handled through Administration. If approached by a representative of the media refer that representative to the Administrative staff.
- Falsification of forms, records, or reports, including, but not limited to, timesheets, application materials, time and expense reports, or employee records.
- Theft.
- Actual or threatened physical violence toward another employee, patient, member of patient's family, visitor, vendor, or client.
- Fighting, gambling, horseplay or using profane, obscene or abusive language while at work.
- Threatening, intimidating or coercing others while on company premises or vehicles or whenever representing Nurses & Company, discourtesy, conduct creating disharmony, irritation or friction, or the unwillingness or inability to work in harmony with others.
- Failure to perform work, inefficient performance, or incompetence or neglect of work. Excessive tardiness or absenteeism.
- Insubordination or refusing to follow supervisor's directions or other disrespectful conduct to a supervisor or manager.
- Violating safety or health rules or practices or engaging in conduct that creates a safety or health hazard.
- Violating any company policy or any workplace rule.

Dismissal

Employment and compensation with Nurses & Company is **At Will** in that employees can be terminated with or without cause, and with or without notice, at any time, at the option of either Nurses & Company or the employee, except as otherwise provided by law.

- d. Has a permanent or chronic physical or mental ailment or defect that incapacitates him/her for the proper performance of the duties of the position, including unrehabilitated alcoholism or narcotics addiction.
 - e. Has been habitually tardy in reporting for duty or has absented himself/herself frequently from duty during the course of regular working hours; or has been completely absent from duty without prior or subsequent authorization for such absences.
 - f. Has been convicted of a felony or of a misdemeanor involving moral turpitude (lewdness).
 - g. Has been guilty of scandalous and disgraceful conduct while on or off duty where such conduct tends to bring the agency into the public disrepute, or has exhibited behavior that adversely affects the employee's job.
 - h. Has been guilty of abusive or improper treatment of patients while on duty with Nurses & Company.
 - i. Has been guilty of insubordination or has failed to respond in a reasonable manner to orders or instructions of persons with duly delegated authority over the employee.
 - j. Has been abusive or physically violent toward other employees while on duty or in the work area or has willfully exhibited behavior which is disruptive of the work activities of other employees.
 - k. Has unlawfully manufactured, distributed, purchased, dispensed, possessed or used alcoholic beverages or controlled substances (drugs) at any work site.
 - l. Has reported for duty in an intoxicated or impaired condition from use of alcohol or controlled substances.
 - m. Falsification of any information.
 - n. Has breached the confidentiality of employees and/or patients.
4. If an employee believes he or she did not receive fair treatment, the employee is encouraged to follow the Nurses & Company's established grievance policy.
5. In accordance with federal regulations, sanctions are also applied against employees for violations of the Nurses & Company's privacy and/or security practices and policies and procedures (HIPAA).

NURSES & COMPANY STANDARDS OF CONDUCT

Nurses & Company is a team of professionals dedicated to health care excellence who provide comprehensive, multidisciplinary and cost efficient health care to patients in the community. We will continually strive to maintain the highest quality of care for those we serve.

Nurses & Company is committed to provide patient care in accordance with all federal and state guidelines. The compliance program is designed to identify and prevent potential areas of fraud, waste or abuse and correct any instances of non-compliance.

Nurses & Company does not offer or provide gifts for the purpose of inducing referrals in violation of the anti-kickback statute.

Nurses & Company will conduct ongoing and comprehensive assessment of the quality and appropriateness of agency services and operations. This includes monitoring the continued effectiveness of the corporate compliance program.

Nurses & Company will provide ongoing training of its employees, contract staff, independent contractors and other significant agents on matters related to the compliance program, fraud and abuse, ethical practices and compliance with federal and state regulations.

Nurses & Company has designated the Director of Operations and/or Director of Clinical Services to serve as the Compliance officer(s). The compliance officer(s) are responsible for designing, implementing, maintaining and evaluating the compliance program.

Nurses & Company employees have a responsibility to report suspected wrongdoing or violation of the Standards of Conduct, Policy and Procedures or healthcare regulations without the fear of reprisal.

Disciplinary action will be taken against employees who fail to comply with the agency's Standards of Conduct, Policy and Procedures or healthcare regulations.

Reports of potential wrongdoing or suspected fraud and abuse are thoroughly investigated, documented and if appropriate reported to the federal and state authorities.

Billing practices are conducted in an ethical manner and are in compliance with all federal and state laws and regulations.

All employees are required to adhere to the privacy and security policies and procedures practices as noted in the HIPAA regulations of Nurses & Company. Employees are made aware that sanctions will be applied for non-compliance.

I have read and understand the Standards of Conduct required by Nurses & Company and I agree to adhere to those standards.

Signature

Date



TM
Nightingale
Home Healthcare

A black and white photograph of an elderly woman with short, curly hair. She is shown from the chest up, wearing a light-colored, possibly white, top. Her right hand is raised to her face, with her fingers resting near her chin and mouth. She has a contemplative or serene expression, looking upwards and slightly to the right. The background is a soft, out-of-focus pattern.

*Cultural Diversity
in Homecare*



OVERVIEW:

As home health care providers we encounter people from all walks of life. Since home is the primary place which our patients and their families live by their own cultural standards, it is important that we respect their values, beliefs and rituals. Often times gender or race are what we use to define a particular culture when in all reality, either represent a true culture. Cultural awareness is a key component in responding to and communicating with all different types of people. *It is important to know that we will be talking about generalizations and we need to be culturally sensitive and aware to each patient individually.*

FACTS ABOUT CULTURAL DIVERSITY

“Culture” is a term many people think they understand. However, because the word is often used for describing things other than culture, there is a lot of misunderstanding.

Culture is a social pattern of behaviors, beliefs and characteristics of a group of people that is passed on from generation to generation. *Cultural characteristics and very different from physical characteristics. Many people with the same physical characteristics do not have similar cultural characteristics, thus, it is important we don't prejudge based on our patients appearance.*

EASTERN ASIAN AND PACIFIC ISLANDERS (Chinese, Koreans, Japanese, Vietnamese, Hmong, Indonesians, Filipinos and Samoans)

Often there are special diets taken during times of illness. Fish, fruits, vegetables are the primary diet, along with small amounts of chicken, pork and beef. In most of these cultures, a meal is almost like a ceremony and should not be interrupted. Amongst this group there are also several religions practiced including Confucianism, Buddhism, Taoism, Islam, Shintoism, and Roman Catholic. Many times medicinal herbs, folk remedies and rituals are used to prevent or treat illness along with the use of health or spiritual healers. Many believe in reincarnation. Drawing blood may be upsetting to this group. *There is a tendency to hide outward signs of pain, so it may be difficult to make an assessment of patient's actual pain level.*



HAITIAN, PEURTO RICAN AND CUBAN

Diet is important to this group. Many people believe that food has “hot/cold” properties and these must be balanced to have harmony. Some believe illness is supernatural and caused by evil spirits or enemies of deceased relatives. They may wear amulets to protect against evil spirits. Use of herbs and rituals for healing are common. Many people from this group are suspicious and fear hospitals.

RELIGION AND FASTING

It is important to keep in mind that not all members of a particular religious group will hold the same beliefs. The term fasting and the beliefs about fasting may vary in different religious groups as well as within believers of the same religious group. Most of the time “fasting” does not mean to totally go without food. There are many different types of fasts. It does commonly refer to light meals, with not snacks in between. *Almost always, rules of fasting do not apply to the elderly or very ill.*

BAPTIST

Almost all Baptist groups prohibit alcohol as a beverage. Many groups believe in faith healing or “laying on of hands” by preachers or others empowered by God to heal. Many believe medical treatment cures them by God working through the doctors and nurses. Mission work is generally very important to this group. Many may refuse the use of ventilators or resuscitation as they believe it interferes with God’s will.

CHURCH OF CHRIST. SCIENTIST (Christian Scientist)

No dietary restrictions, however most do not drink alcohol. They are generally opposed to all medications and medical treatment. There are “Practitioners or Readers” who assist families in time of illness. The Christian Scientist Church does not have any type of clergy, priests, or preachers. Lay members lead all services.



ISLAM (Muslim or Nation of Islam) (Ramadan about mid Aug to mid Sept)

Muslims do not eat pork or port products and generally do not use alcohol. During Ramadan (the last month of the Mohammedan year) they do not eat during daylight hours. They accept standard medical care, and generally oppose faith healing. Muslims perform prayers five times daily. There is usually ritual washing after prayers. There are several different sects of Islam and each is somewhat different.

JEHOVAH'S WITNESS

Witnesses eat meat, but only if blood has been drained. They are absolutely opposed to blood transfusions, as well as any vaccines made with blood components. Otherwise, they accept standard medical care. They do not participate in or celebrate nonreligious holidays. They do not salute the flag, nor recite any pledges and will not bear arms in military service.

JEWISH (Passover usually end of March to first week April – Hannakuh Usually about 1st week Dec, lasts 8 days)

Dietary habits depend upon whether they are Orthodox, Reform, or Conservative. The Jewish do not eat pork, only meat that comes from animals that eat vegetables, have cloven hooves, or chew their cud. Meat must be ritually slaughtered to make it "kosher". They do not eat seafood unless it has scales or fins. Orthodox and other Jewish who strictly observe kosher laws never combine meat products and dairy products, and do not store them together. They may have two sets of dishes and two refrigerators; one for meat and one for dairy. During Passover, they do not eat any leavened bread (containing yeast or any products that cause it to ferment and rise). They may refuse surgery during the Sabbath (sundown on Friday until sundown on Saturday). Since Kosher foods are high in sodium, patient on low salt diets do not have to use kosher meats. Jewish generally oppose prolonging life with life-support. Amputated limbs and other parts of the body removed by surgery are given to family for burial. On the Sabbath, Orthodox Jews do not use cars, do not cook nor do work of any kind.



ROMAN CATHOLIC

Catholics fast and do not eat meat on Ash Wednesday or Good Friday. Most still do not eat meat on Fridays during Lent, and some Catholics still follow old practice of not eating meat on any Friday of the year. The Church does not approve use of contraceptives, abortion, or fertility treatments. Most request anointing of the sick during major illness. Homecare patients may refuse to eat or drink for an hour before someone is bringing them communion. The authority over all Roman Catholic churches is the Pope.

RUSSIAN ORTHODOX OR GREEK ORTHODOX

Although different, they share many of the same beliefs. They do not eat meat/dairy products on Wednesday or Friday. Most believe in divine healing, however they are not opposed to standard medical care. Most Russian Orthodox wear a cross necklace that is only removed when absolutely necessary and replaced as soon as possible. *Never remove a necklace without first asking the patient or family.*

POINTS TO REMEMBER

- Do not draw conclusions about a patient based on his or her culture. Every patient has is an individual. We need to recognize that people of different cultural groups might have very different views about eating habits, child rearing, cleanliness, privacy, and health care.
- The more we learn about different cultures and the better understand them, the better clinicians we will be. Always respect and do not interfere with cultural beliefs. Remember that every household is different and the people living there may have different standards and their own rules. One of our biggest roles is to respect the rights of patient in their own homes.
- It is important to be aware and identify what your own cultural beliefs are. Otherwise, you might not know how these beliefs might affect the manner in which you approach other people.



- You should never try to change a patient's cultural beliefs, or try to convert them to your own.
- If you reason to believe that some cultural practices are actually harming your patient, call your Clinical Coordinator to discuss and notify the physician. Don't directly interfere.
- Most importantly, you must realize that not all members of the same cultural group will behave exactly the same.

ETHICS CODE

POLICY:

Nurses & Company assures home health services are provided in accordance with the highest standards of ethical behavior.

PURPOSE:

1. To meet the home health care needs of patients and their families.

- To remain sensitive to and be appreciative of the ethnic, cultural, religious, spiritual and lifestyle diversity of patients and their families.
- To ascertain and honor the wishes, concerns, priorities and values of the patients and their families consistent with the law and the organization's values as stated in its policies.
- To support, affirm and empower the families as caregivers.
- To acknowledge and respond with sensitivity to the interruption of privacy that is necessitated by care at home; to enter no further into family life and affairs than is required to meet goals of the plan of care.
- To respect and protect the confidentiality of information concerning patients and families.
- To provide quality home health and palliative care services in a timely manner to all who qualify, regardless of race, religion, sexual orientation, gender identity, ethnic background, or ability to pay.
- To recognize the vulnerability of those who receive care, and thus refrain from accepting personal gifts of significant value.
- To recognize the vulnerability and privacy needs of the patient and family, thus displaying extraordinary sensitivity in offering opportunities to promote homecare and palliative care.

2. To act honestly, truthfully and fairly to all concerned.

- To fully disclose to patients and families information regarding cost, services and complaint policies, as well as any policies regarding discontinuation of service.
- To honestly and conscientiously cooperate as an agency in providing information about referrals and to work with other agencies to ensure comprehensive services to patients and families.
- To be truthful and accurate in public advertising and information dissemination.
- To make and accept referrals solely in the best interest of the patients.
- To refrain from giving or accepting gifts of value or monetary compensation for the purpose of obtaining or making referrals.
- To ensure that homecare services are not diluted for financial reasons.

3. To instruct both local and national communities in the tenets of home health.

- To provide the consumer with sufficient information about home care.

4. **To continuously strive for the highest level of skill and expertise of the staff and volunteers in the delivery of care.**
- To recruit, select, orient, educate and evaluate each staff person to ensure competency based on identified job requirements.
 - To remain sensitive to and be appreciative of the ethnic, cultural, religious, spiritual and lifestyle diversity of staff.
 - To support, affirm and empower the staff in the delivery of care.
 - To ensure that contracted providers are properly trained and qualified, and that they provide care consistent with the values and philosophy of homecare.

Recognizing that situations do and will arise when ethical principles conflict, Nurses & Company has a process and format in place to deal with situations arising from conflicts based on ethical principles, an ethical committee to address the situations.

ETHICS TEAM

POLICY:

Nurses & Company will provide a mechanism for the resolution of ethical issues.

PURPOSE:

To provide a forum for discussion in order to resolve actual or potential ethical concerns for the staff and patients of Nurses & Company.

PROCEDURE:

A multidisciplinary team will be available to discuss ethical concerns brought to supervisor's and/or clinical director's attention. When the ethical issue cannot be resolved by supervising staff, the issue will go before a multidisciplinary team. The team will be comprised of a member of clergy, a social worker, a member of the visiting staff and a member of Nurses & Company's administrative staff. Depending upon the severity of the concern, the ethics team will meet within the maximum of 5 business days of the concern being brought to the supervisor's attention. The employee voicing the concern will present to the ethics team a synopsis of the concern and his/her viewpoint of the ethical question. The issue is again discussed after the individual has left the meeting. Follow-up by the ethics team with recommendations for resolving the issue presented will be given in writing to the concerned individual and the governing body within 14 days.

All employees will be oriented and educated annually on identification, evaluation and discussions of all ethical issues and the procedure for utilizing the ethical team. All staff will be given examples of ethical issues and the process to follow when ethical issues are identified.

CONFLICTS OF CONSCIENCE

Nurses & Company recognizes the rights of its employees not to participate in aspects of care or treatment that are in conflict with cultural values or religious beliefs.

If an employee is requested or required to perform duties which are objectionable due to religious or other personal convictions, the matter should be immediately discussed with the employee's supervisor and or the appropriate administrative staff. Nurses & Company will make every effort to honor the employee's convictions.

CONFLICTS OF INTEREST

Nurses & Company provides services and conducts business in a manner that avoids potential or actual conflicts of interest. A potential or actual conflict of interest arises when an individual's commitments and obligations to Nurses & Company are likely to be compromised by other interests or commitments, particularly economic, especially if those interests or commitments are not disclosed. In the event of a situation arising that could cause a conflict related to patient care or an operational business interest, an independent evaluation would be performed.

Examples of potential conflicts of interests that must be disclosed may include, but not be limited to:

- Any material or financial interest in any entity that provides goods or services to Nurses & Company
- Unauthorized use of confidential or proprietary information obtained in connection with one's position at Nurses & Company or use of such information for personal or financial benefit or the benefit of a close relation
- Functioning as a director or trustee of an organization that conducts business with Nurses & Company
- Use of the patient's vehicle

Also, and included in the Standards of Conduct, are the following:

- Soliciting or accepting money or goods for personal gain from a patient
- Purchasing any item from the patient, even at fair market value
- Assuming control of the financial or personal affairs or both of the patient or of his/her estate, including power of attorney, conservatorship, or guardianship
- Residing with the patient in either the patient's or employee's residence

Potential conflicts of interest are reviewed by the Administrator and/or other administrative staff to determine appropriate action. In the event of proceedings that require input, voting, or decisions, the individual(s) with a conflict of interest are excluded from the activity. Failure to disclose existing or potential conflicts of interest is grounds for termination of employment.