



# CODE OF CONDUCT

*Integrity • Compassion • Accountability*

COMPLIANCE & ETHICS PROGRAM



*The heart of Sunnyside Village has always been,  
and will always be, its people.*



SERVING WITH  
HEART



BUILDING COMMUNITY  
TOGETHER



ROOTED IN FAITH.  
FOCUSED ON PEOPLE.

# Code of Conduct

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Sunnyside Village is a not-for-profit, faith-based senior living community committed to enriching the lives of older adults through compassionate care, meaningful relationships, and a vibrant community experience. Founded in 1968, Sunnyside Village has proudly served residents and families for more than 50 years through a tradition rooted in dignity, respect, service, and Christian values. Located in Sarasota, Florida, Sunnyside Village provides a broad range of residential, healthcare, and supportive services designed to meet the changing needs of those we serve. Our community offers:

- **Independent Living**
- **Assisted Living**
- **Memory Support Services**
- **Skilled Nursing & Rehabilitation Services**

At Sunnyside Village, we are committed to providing exceptional care and services while maintaining the highest ethical, professional, and legal standards. As part of our team, you are expected to follow our Compliance and Ethics Program and this Code of Conduct. Our team includes employees, licensed professionals, contractors, consultants, volunteers, students, vendors, and others who support our mission through direct care, operational services, and professional partnerships. Because organizations like ours are regulated by numerous federal and state laws, every team member shares responsibility for acting with integrity and complying with applicable requirements.

This Code of Conduct serves as a guide to ethical decision-making and professional behavior. It is intended to help team members understand their responsibilities, promote a culture of honesty and accountability, and support Sunnyside Village in preventing fraud, waste, abuse, misconduct, and unsafe practices. The success of our Compliance and Ethics Program depends upon every team member's commitment to doing the right thing, asking questions, and speaking up when concerns arise.

*The Compliance Officer at Sunnyside Village is Karla Dreisbach, AQORD.  
The Compliance Official is Macey Walker, Director of Resident Experience.*



*From the desk of our Chief Executive Officer (CEO)*

## **INTRODUCTORY LETTER**

Dear Team Members,

At Sunnyside Village, we are deeply rooted in a tradition of serving older adults through a ministry of love, compassion, purpose, and respect. Our mission calls us to enrich the lives of those we serve by honoring the dignity, individuality, and worth of every resident. This commitment guides not only the care we provide, but also the way we treat one another as team members.

As the healthcare environment continues to evolve, we are increasingly guided by laws, regulations, and professional standards that shape our daily work. In response, Sunnyside Village has established a comprehensive Compliance and Ethics Program to support each of you in making thoughtful, ethical, and compliant decisions. At the heart of this program is our *Code of Conduct*, which reflects both our faith-based values and our commitment to doing what is right.

Our Compliance Plan, along with our policies, procedures, and *Code of Conduct*, exists to help ensure that every decision we make aligns with our mission, our values, and all applicable laws and regulations. These resources are not meant to replace your judgment, but rather to support you in navigating complex situations with integrity, fairness, and accountability. Each of us plays an important role in upholding these standards and protecting the trust placed in us by our residents and their families.

We are grateful for the compassion, professionalism, and dedication you bring to your role each day. Your commitment to ethical conduct and integrity helps create a culture where residents feel safe, valued, and cared for, and where team members like yourself feel supported in doing the right thing. Thank you for all that you do to advance the mission of Sunnyside Village and to serve our residents with excellence and heart.

Sincerely,

A handwritten signature in black ink that reads "Heather L. Neff". The signature is written in a cursive, flowing style.

Heather Neff  
Chief Executive Officer

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## Our Mission

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The Mission of Sunnyside Village is to honor God by enriching the lives of residents, staff and the community by providing homes, services and programs in a Christian environment.

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## Guiding Core Values

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At Sunnyside Village, we strive to reflect Christ's love in all we do. Together, we carry forward a mission that began with faith and continues with purpose through:

- **Honesty** – We are committed to truthfulness, transparency, and integrity in all that we do. We communicate openly, act ethically, and hold ourselves accountable to doing what is right, even when no one is watching.
- **Kindness** – We treat every person with compassion, empathy, and respect. Through thoughtful actions, gentle words, and meaningful service, we strive to create an environment where all feel valued, supported, and cared for.
- **Humility** – We lead and serve with grace, recognizing the value and dignity of every individual. We listen with open hearts, remain teachable, and place the needs of others above personal recognition.
- **Joyfulness** – We embrace each day with hope, positivity, and a spirit of encouragement. We celebrate life's moments, foster meaningful connections, and seek to bring warmth and joy to those around us.
- **Gratefulness** - We approach our work and relationships with appreciation for the opportunity to serve. We honor the trust placed in us by residents, families, and one another, recognizing the many blessings found in community.

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## Introduction

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Our *Code of Conduct* is a guide to appropriate workplace behavior. Refer to this guide whenever you are unsure of how to make the right decision(s) or how to respond to a situation. Employees and individuals all share a commitment to legal, ethical, and professional conduct in the workplace. This Code of Conduct is one of three documents that guide our work. For more detailed information, you can read the *Compliance Plan* and the *Compliance Policies and Procedures*. The Compliance Plan and Code of Conduct include the federal, state, and local laws we must follow.

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## Our Responsibilities

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As part of our team, we each share a responsibility and commitment to our residents, their families and each other. As part of your commitment to our team, it's important that you always make legal and ethical decisions. Additionally, if you see anyone else on the team violating the Code of Conduct, it's your responsibility to report those violations to the compliance officer. Reporting violations of the Code of Conduct is not optional. **You must report anything you see that may be unethical, illegal, or unprofessional.** Our reporting process includes several ways for you to share any concerns you may identify.

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## The Reporting Process

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**You may always call the Compliance Line at (800) 211-2713 or file a report directly at Sunnyside Village.**

- Report to a supervisor. They are most familiar with the laws, regulations, and policies that relate to your work.
- Report to a member of the leadership team, seeking out another or someone from human resources.
- Contact the Compliance Official, a member of the Compliance Committee, or the Compliance Officer.
- Call the toll-free compliance line which is available 24/7.
- Scan the QR code which links to the compliance line portal.



# *Compliance & Privacy Line*

## *1-800-211-2713*

We strive to create a transparent and supportive environment where everyone—staff, visitors, volunteers, and vendors—feels comfortable sharing concerns with us directly. Your input matters, and we’re here to listen and help. If you prefer, you can also report **anonymously** through our compliance line or QR code, ensuring your voice is heard in the way that suits you best.

### **Available 24 hours a day, 7 days a week**

You should call the Compliance Line or use the QR code anytime you are aware of an illegal, irresponsible, or ethically questionable situation and feel you cannot go to the management of Sunnyside Village.

You can make a report in good faith without fear of reprisal, retaliation or punishment for your actions.

*Facility name and location must be provided  
in order to initiate an investigation.*

Macey Walker  
Compliance Official  
[mwalker@sunnysidevillage.org](mailto:mwalker@sunnysidevillage.org)  
941-371-2750, ext. 681

Use your smartphone or tablet to scan QR code. Follow the link that appears on your screen. Fill out the form with details about your concern. Submit and remain anonymous.



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## **Key Areas of Compliance Responsibility**

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At Sunnyside Village, compliance is part of everyone's role. While every team member has different responsibilities, we all share a commitment to ethical conduct, resident safety, and adherence to applicable laws and organizational policies. The following areas represent key compliance responsibilities that support our mission and protect those we serve.

### ***Resident Privacy & Confidentiality***

We are committed to protecting the privacy and dignity of every resident. Team members must safeguard medical, financial, and personal information and only access or share information necessary to perform job duties in accordance with HIPAA and other applicable privacy laws.

### ***Abuse, Neglect, & Exploitation Prevention***

Residents have the right to live free from abuse, neglect, mistreatment, and exploitation. Every team member is responsible for maintaining a safe environment and must immediately report any suspected abuse, neglect, exploitation, or inappropriate conduct.

### ***Accurate Documentation & Billing***

Honest and complete documentation supports quality care and ethical business practices. Team members must ensure records, care documentation, timekeeping, billing, and claims submissions are accurate, timely, and truthful. False or misleading documentation is strictly prohibited.

### ***Fraud, Waste, & Abuse Prevention***

Sunnyside Village maintains zero tolerance for fraud, waste, or abuse involving resident care, financial resources, government healthcare programs, or organizational assets. Team members are expected to report any suspected misconduct or misuse of resources.

### ***Workplace Safety & Emergency Preparedness***

A safe environment is essential to quality care and service. Team members are

expected to follow all workplace safety practices, infection prevention measures, emergency preparedness procedures, and environmental safety protocols to protect residents, visitors, and one another.

### *Professional Conduct & Respectful Workplace*

We are committed to maintaining a respectful, professional, and inclusive workplace. Harassment, discrimination, retaliation, workplace violence, or inappropriate conduct of any kind will not be tolerated.

### *Conflicts of Interest*

Team members must avoid situations where personal interests, financial relationships, or outside activities could interfere with sound judgment or create the appearance of impropriety. Any potential conflicts should be disclosed to leadership.

### *Gifts, Gratuities, & Professional Boundaries*

Maintaining professional boundaries protects both residents and team members. Employees may not solicit or accept inappropriate gifts, tips, loans, or items of significant value from residents or families, nor engage in financial or personal arrangements that create conflicts or ethical concerns.

### *Use of Technology & Organizational Resources*

Sunnyside Village technology, communication systems, equipment, and resources are intended for authorized business purposes. Team members must use these systems responsibly and never access, alter, or share information inappropriately.

### *Reporting Concerns & Non-Retaliation*

Every team member has a responsibility to speak up when something does not seem right. Concerns raised in good faith will be taken seriously and reviewed appropriately. Sunnyside Village strictly prohibits retaliation against anyone who reports a concern, seeks guidance, or participates in an investigation.

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## Resident-Centered Care & Rights

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The foundation for good quality of care and quality of life is understanding and honoring resident rights. As we provide care, it is important to respect residents' rights. This includes:

- Always treating residents equally and in respectful ways, preserving their dignity, autonomy, self-esteem, and civil rights.
- Protecting resident privacy and confidentiality, particularly with regard to medical, financial, or personal information as required by HIPAA
- Respecting and protecting the personal property and money of all residents from loss, theft, improper use, and damage.
- Ensuring that residents and their legal representatives understand and participate in decisions about their care and treatment.
- Protecting every resident from physical, emotional, verbal, sexual or mental abuse or neglect. Any team member who abuses or neglects a resident can be terminated.

**If you witness any form of abuse, you must report it immediately to your supervisor. Sunnyside Village will not tolerate any type of resident abuse or neglect at any time.**

- Providing the individual needs of our residents and developing care plans based upon their assessed needs.
- Monitoring our services to ensure that our residents receive quality services through Quality Assurance and QAPI.
- Assuring that our staff is qualified with appropriate licenses and experience.
- Maintaining our policies, procedures, and practices are current and in line with the rules and laws we need to follow.
- Completing accurate and timely documentation and billing for the services provided.

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## Professional Responsibilities

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As an employer, we promise to follow **fair employment practices** when hiring, screening, and evaluating our employees. Federal, state, and local laws guide our employment practices and provide us with a roadmap to compliance.

To keep residents safe, we screen all employees against various databases as required by law. As long as you work here, you must immediately tell your supervisor if any of your actions inside or outside of work might affect your employment. You must report any arrests or indictments, convictions, revocation of professional licenses, exclusions, or anything else that might prevent you from working at a healthcare organization.

The professional, responsible, and ethical behavior of every team member reflects directly on our reputation. As a team member, you must strive to make decisions that are honest and professional every day.

If you are a team member with a **professional license**, it's your responsibility to ensure you follow all applicable licensing, credentialing, and certification requirements and keep it current and in good standing.

We will not tolerate any form of **sexual harassment or violence** in the workplace. Additionally, team members may not supervise or be supervised by anyone with whom they have a close personal relationship.

You must follow our safety protocols that are here to protect you and the residents, including but not limited to our emergency plans, hazardous materials, and environmental policies. Let your supervisor know of any potential hazards immediately.

**Safety in the workplace** includes refraining from using any substances that impair your ability to do your job. You may never use, sell, or bring alcohol, illegal drugs, and/or narcotics on our property. You may never come to work under the influence of alcohol or illegal drugs. We have the right to screen and discipline any employee suspected of violating the drug and alcohol policy.

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## Governance & Oversight

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We are committed to ensuring our organization remains in **compliance** with all applicable federal and state laws. As a team member, you must also help our organization always remain in good standing with regard to our business practices.

During the course of your job, you may have access to confidential and proprietary information. **Proprietary information** is any information an organization creates or owns, such as policies and procedures, compensation, or marketing and advertising plans. Confidential or proprietary information should not be shared with anyone outside Sunnyside Village without prior permission.

Team members may not solicit or accept personal cash gifts, tips, loans, or items of significant value from residents, prospective residents, or their families. Modest tokens of appreciation intended for a department or team may be accepted in accordance with organizational policy. Residents wishing to express appreciation are encouraged to contribute to approved employee recognition initiatives. Likewise, you may not give residents gifts.

Team members must always avoid conflicts of interest. A conflict of interest is when your personal interests may interfere with your ability to make good decisions for Sunnyside Village. If you are unsure if a situation or relationship is a conflict of interest, talk with your supervisor.

Throughout the course of your job, you may use our **computers systems and networks**. You have **no expectation of privacy** while using our computers systems and using them improperly or illegally is a violation of the Code of Conduct. When using your work computer to create documents, records, emails, medical records, billing records, and financial records, team members must never falsify or alter any document in an illegal or unethical way.

We use **marketing and advertising** to educate the public about our community services, activities, and opportunities. All marketing and advertising materials are truthful and informative and are designed to be honest and accurate. Team members and individuals often have **relationships** with other healthcare providers and referral

sources. All relationships with these professionals must be open, honest, and legal.

We are required to follow many federal, state, and local laws, often subject to change. Management will communicate about these changes when they occur and educate employees and individuals as needed. It's your job to read these **updates**, so you always have the most up-to-date information.

We are committed to **ethical and honest billing practices**. All team members must make truthful, accurate, and complete statements and submissions for billing. We have zero tolerance for false or inaccurate coding or billing. Any team member who knowingly submits a false claim or provides information that could result in a false claim may be disciplined up to and include termination. Additionally, if you witness or suspect another employee or individual member of making false billing claims, you must report the activity to your supervisor or the compliance officer/designee.

We will take **disciplinary action** against a team member who violates this Code of Conduct, the Compliance and Ethics Program, the supporting policies and procedures, and applicable federal, state, and local laws. Disciplinary action could come in the form of termination of employment or business relationships, civil penalties, and/or criminal investigation. We may also initiate disciplinary action against any employee who **retaliates** against another employee following the Code of Conduct and applicable laws. Sunnyside Village strictly prohibits retaliation against any individual who, in good faith, raises a compliance concern, reports suspected misconduct, participates in an investigation, or seeks guidance regarding ethical concerns. Retaliation itself is a violation of this Code of Conduct and may result in disciplinary action.

You are valued here. We trust you to always make ethical and honest decisions during your employment here. If ever you have a question about compliance or ethics in your decision making, please discuss the issue with your immediate supervisor or our compliance officer.

The Compliance and Ethics Program is critical to our continued success. The Code of Conduct and the Compliance and Ethics Program set standards for our legal, professional, and ethical conduct. Some key points to remember are:

- We are committed to personal and organizational integrity, acting in good faith,

and being accountable for our actions.

- The Code of Conduct and the Compliance and Ethics Program prepare us to deal with the growing complexity of the ethical, professional, and legal requirements governing healthcare in the CCRC environment.
- The Compliance and Ethics Program is an ongoing initiative designed to foster a supportive work environment, provide standards for clinical and business conduct, and offer education and training opportunities for team members.

The success of the Compliance Program depends on our commitment to act with integrity, both personally and as an organization. As a team member, your duty is to ensure that you are doing everything practically to comply with applicable laws. You are expected to satisfy this duty by performing your responsibilities in accordance with professional standards, the regulations guiding our business practices, and our policies and procedures.

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## **Making the Right Decision: “Ask Before You Act”**

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At times, situations may arise where the right answer is not immediately clear. Before taking action, pause and ask yourself the following questions:

- **Is it legal?** Does this action comply with laws, regulations, policies, and professional standards?
- **Is it ethical?** Does it align with our commitment to honesty, compassion, and integrity?
- **Does it reflect Sunnyside Village values?** Would this action support our mission and honor the dignity of residents, families, and team members?
- **Would I be comfortable if this were publicly known?** Would I feel comfortable explaining this decision to a resident, family member, supervisor, regulator, or in a public setting?
- **Am I protecting resident trust and safety?** Does this action place the resident’s wellbeing, privacy, and dignity first?
- **Have I asked for help if I am unsure?** If something feels unclear, uncomfortable, or inconsistent with our values, seek guidance before moving forward. Asking questions and raising concerns is part of our commitment to ethical and responsible care.

## **Your Compliance Official:**

Macey Walker, Director of Resident Experience,  
Campus Risk Manager/Compliance Official  
(941) 371-2750

## **Your Compliance Officer:**

Karla Dreisbach, CHC, CHPC, CCEP  
AQORD Compliance Collaborative  
(215) 646-0720

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## **Our Commitment to Integrity**

At Sunnyside Village, our commitment to ethical conduct, compassion, and integrity is fundamental to who we are. The trust placed in us by residents, families, fellow team members, and our greater community is both a privilege and a responsibility we honor each day.

Our Code of Conduct serves as a guide for how we care for one another, make decisions, and uphold the mission and values of Sunnyside Village. While policies and regulations provide direction, it is our shared commitment to honesty, accountability, professionalism, and kindness that defines our culture and strengthens the community we serve.

Every team member plays an important role in maintaining an environment built upon trust, dignity, safety, and respect. We are expected to act ethically, comply with applicable laws and organizational policies, and speak up when concerns arise. When we work together with integrity and purpose, we preserve the legacy of Sunnyside Village and ensure a vibrant future for those who call our community home.

You are valued here, and your contributions matter. Thank you for your commitment to serving with excellence, compassion, and heart. Together, we continue to build a community where residents thrive, relationships flourish, and every person is treated with dignity and respect.

### **A Final Reminder**

When faced with uncertainty, remember this simple principle:

**Do the right thing. Ask questions. Speak up. Care deeply.**

If you are ever unsure how to proceed, seek guidance from your supervisor, Human Resources, the Compliance Official, or the Compliance Hotline. Asking for help is a sign of professionalism and commitment to doing what is right.