

## Regulatory Excellence

We are obligated to follow federal, state and local laws governing our business. Therefore, team members must adhere to the highest standards of business practice as well as commit to continued learning and staying informed with respect to compliance related issues.

### This includes:

- committing to honest and ethical billing and communications;
- avoiding any kickbacks for referrals;
- avoiding inducements;
- respecting copyright laws;
- operating with standards of financial practices and controls;
- dealing fairly with all our contacts;
- maintaining integrity and accuracy with regard to all documentation;
- voluntarily disclosing the discovery of non-compliance;
- cooperating with government investigations;
- and not accepting gifts, tips or inducements.

Partner of the  
Friends Services Alliance  
Compliance Collaborative



## A Personal Obligation:

We all have a duty to report any problems or concerns observed or perceived.

### Reporting Options

1. Team members should talk to the supervisor on duty.
2. If you are unable to talk to a supervisor, seek out another member of the management team or Human Resources Department.
3. If you still have a concern, contact the Compliance Officer (contact info on brochure front cover) or a member of the Compliance Committee listed below.
4. **Concerns may be reported to our external**

**COMPLIANCE LINE:**  
**800-211-2713**

**Calls are confidential and may be made anonymously.**

## Compliance Committee

Harry McConnell, President  
Vicki Deitzler, VP for Advancement,  
Compliance Officer  
Kate Davies, Director of Nursing  
Brooke Fogel, VP of Finance  
Keith Fernsler, Director of  
Information Technology  
Kirk Rakos, Personal Care Administrator  
Minnie Strickler, VP of Health Services  
Greg Weaber, VP of Human Resources  
Paul Weidman, VP of Plant Operations

***Our success depends upon your commitment to act with integrity.***

# Cornwall Manor Code of Conduct Summary



**CORNWALL  
MANOR**

Access the entire *Code of Conduct* at:  
[cornwallmanor.org/compliance](http://cornwallmanor.org/compliance)

or Contact:  
Vicki Deitzler,  
Compliance Officer

Cornwall Manor  
P.O. Box 125  
Cornwall, PA 17016

[vdeitzler@cornwallmanor.org](mailto:vdeitzler@cornwallmanor.org)  
717-675-1510

## Cornwall Manor *Code of Conduct*

Cornwall Manor is a nonprofit continuing care retirement community.

Cornwall Manor's compliance and ethics program covers the compliance laws, issues, regulations and guidelines that are relevant to senior living service providers, including residential, personal care and skilled nursing services.

Our Code of Conduct is a shared responsibility that applies to every person at every level of our organization. This includes employees, the Board of Trustees, volunteers, as well as independent contractors, subcontractors and vendors who may provide or are involved with healthcare or billing.

As you read this summary of Cornwall Manor's Code of Conduct, the term **team member** will refer to all employees, vendors, contractors, volunteers, directors and officers providing care and services at Cornwall Manor.

Our Code of Conduct is supported and guided by policies and procedures. Any questions may be directed to supervisors; the Compliance Officer: Vicki Deitzler, whose contact information is found on the front cover of this brochure or any member of the Compliance Committee listed on the back cover.

## Care Excellence

Our top priority is providing the highest quality care to our residents. We do this compassionately while working toward the best possible outcomes and following all applicable rules and regulations.

### **This includes:**

- honoring Resident Rights;
- zero tolerance for abuse and neglect;
- maintaining confidentiality of all resident information;
- respecting and protecting resident property to prevent loss, theft, damage and misuse;
- providing quality care;
- accurate assessments and care planning;
- providing only medically needed services;
- using current practice standards;
- accurate and timely documentation;
- measuring clinical outcomes;
- assuring our workforce has appropriate experience and expertise to provide services;
- Quality Assurance Performance Improvement programs to improve outcomes;
- and committing to comprehensive medically needed services. The Medical Director will have oversight of physicians and other medical services.

### **Abuse Reporting:**

Any team member who abuses or neglects a resident is subject to termination as well as legal and judicial action. Health care workers are mandated reporters and must report any reasonable suspicion of abuse.

**Resident abuse and neglect at Cornwall Manor must be immediately reported to Minnie Strickler, Vice President of Health Services, 717-675-1545**

## Professional Excellence

The professional, responsible and ethical behavior of every team member impacts the reputation of Cornwall Manor and the services we provide. Whether you interact directly with residents or in other areas that support resident services, you are expected to maintain standards of honesty, integrity and professional excellence every day.

### **This includes:**

- hiring the best qualified employees regardless of race, color, age, religion, national origin, gender identity, sexual orientation or disability;
- criminal background checks and sanction screenings;
- making the workplace a safe, ethical and comfortable environment including a workplace free of substance abuse;
- assuring company privacy and assuring proprietary information is kept confidential;
- following the Business Courtesies and Resident Gift policies;
- reporting any actual or potential conflict of interests;
- using property appropriately and respecting property and copyright laws;
- ensuring appropriate use of technology, which eliminates improper, unlawful activity, downloads or use of games on our communities computers;
- being responsible as an organization to have honest and ethical vendor relations;
- and assuring truth in marketing and advertising.