



Calvary Fellowship Homes  
502 Elizabeth Drive  
Lancaster, Pennsylvania 17601  
717-393-0711  
[www.calvaryhomes.org](http://www.calvaryhomes.org)

Adopted May 1, 2003, revised June 2023.

Dear Vendor/Contractor/Physician/Service Provider:

Calvary Fellowship Homes, Inc. (collectively, the “Organization”) is committed to ethical, non-discrimination, elder justice, and honest billing practices and expects every team member (including employees, independent contractors, subcontractors and vendors) to be vigilant in maintaining these standards at all times. It is important that our contractors understand the provisions of a number of laws, your obligation to act under these laws and your right to report if you suspect a violation as well as protections available for those who report violations of these laws. Please ensure your staff are familiar with the below listed laws and regulations.

- A. Compliance Program:** The Organization has a compliance program. A core document of any compliance program is the Code of Conduct which covers the compliance issues, laws and regulations and guidelines that are relevant to providers of senior services. This Code of Conduct is relevant to all individuals, including employees, contractors, volunteers, directors and officers. **See below for our Code of Conduct.**
  
- B. Excluded Provider Policy:** The Organization cannot do business with any individuals or entities sanctioned by the Federal and State Government. It is your duty to inform us immediately if your organization or anyone under your employment is currently or becomes excluded in the future.
  
- C. Civil Rights Compliance**  
**See below for our statement** to comply with Title VI Federal Civil Rights Act of 1964 and the Pennsylvania Human Relations Act.
  
- D. Elder Justice Act:** Under this regulation it is the obligation of anyone who works for, or contracts with a long-term care community to report to local law enforcement, and to the Secretary of Health and Human Services, their reasonable suspicion of crimes committed against nursing home residents. This reporting must happen in a timely manner.

If the events that cause the suspicion—

1. Result in serious bodily injury, the individual shall report the suspicion immediately, but not later than 2 hours after forming the suspicion;
2. Do not result in serious bodily injury, the individual shall report the suspicion not later than 24 hours after forming the suspicion.

Please be sure to inform all of your employees who, in the course of business, are present on any of our community’s campuses, are aware of these obligations.

**E. Deficit Reduction Act (DRA):** We are required to comply with the DRA. As such we are required to notify our contractors and others of the policies to prevent false claims, retaliation and the rights of whistleblowers. The rules for the DRA include the following;

1. Federal False Claims Act (31 U.S.C. §§ 3729-3733)
2. Federal Civil and Criminal Penalties and Administrative Remedies
3. False Claims Act Civil Penalties (31 U.S.C. § 3729)
4. Program Fraud and Civil Remedies Act of 1986 (“PFCRA”) (31 U.S.C. §§ 3801-3812)
5. Civil Monetary Penalties Law (“CMPL”) (42 U.S.C. § 1320a-7a)
6. Criminal Penalties (42 U.S.C. § 1320a-7b)
7. Exclusion from Participation in Federal Health Care Programs (42 U.S.C. § 1320a-7)
8. State False Claims Laws
9. Federal “Qui Tam” or “Whistleblower” Protections (31 U.S.C. § 3730)
10. You are encouraged to communicate any compliance concerns to our Compliance Officer.  
If you or one of your staff members prefer to report any compliance concern anonymously, please use the Compliance Hotline (see Code of Conduct).

**Please assure that you review your obligation to abide by the items listed above and the attached text as a requirement of doing business with the Organization.**

You can access this information at <https://www.calvaryhomes.org/vendors> or via QR:

On behalf of the Executive Leadership Team and the Board of Directors, “Thank You” for being a trusted partner in our mission:  
*To serve senior adults, enriching their lives in a manner that glorifies our Lord Jesus Christ while maximizing quality of life.*



A handwritten signature in black ink that reads "Dale Weaver".

Dale Weaver, President & CEO



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October 16, 2023

### **Civil Rights Compliance**

The following statement is to comply with Title VI Federal Civil Rights Act of 1964 and the Pennsylvania Human Relations Act. Be it known to all concerned that Calvary Fellowship Homes complies with the following, adopted by the Board on September 19, 1977:

*It is the policy of Calvary Fellowship Homes to admit and to treat all residents and patients without regard to race, color, sex, religion, national origin, ancestry, age, or presence of a disability. The same requirements for admission are applied to all, and residents and patients are assigned within the Home without regard to race, color, sex, religion, national origin, ancestry, age or presence of a disability. There is no distinction in eligibility for, or in the manner of providing, and patient service provided by or through the Home. All persons and organizations having occasion either to refer patients for admission or to recommend Calvary Fellowship Homes are advised to do so without regard to race, color, sex, religion, national origin, ancestry, age, or presence of a disability.*

*Also, in compliance with Section 504 of the Health and Human Services Department regulations, Calvary Fellowship Homes is an equal opportunity employer and does not practice discrimination against qualified persons with disabilities in recruiting, hiring, compensation, job assignment and classification and fringe benefits.*

An open and equitable personnel systems is established and maintained. Personnel policies, procedures and practices will be designed to prohibit discrimination on the basis of race, color, religious creed, disability, ancestor, national origin, age or sex. Employment opportunities shall be provided for applicants with disabilities and reasonable accommodation(s) shall be made to meet the physical or mental limitations of qualified applicants or employees. Any employee, who believes they have been discriminated against, may file a complaint of discrimination with any of the following:

Calvary Fellowship Homes  
502 Elizabeth Drive  
ATTN: Human Resources  
Lancaster, PA 17601

Division of Nursing Care Facilities Director  
Pennsylvania Department of Health  
625 Forester Street  
Harrisburg, PA 17120  
1-800-254-5164

U.S. Department of Health and Human Services  
200 Independence Ave., SW Room 509, HHH  
Washington, D.C. 20201  
1-800-368-1019

PA Human Relations Commission  
333 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
717-787-4410

Sincerely,

Dale Weaver, President & CEO



# CALVARY FELLOWSHIP HOMES CODE OF CONDUCT

Adopted May 1, 2003

Revised June 9, 2023

## Scope of our Program

Calvary Homes Compliance and Ethics Program Code of Conduct covers the compliance issues, law and regulations, and guidelines that are relevant to a provider of senior services including Senior Living Communities that provide a wide range of healthcare services. This includes but is not limited, to The Centers for Medicare and Medicaid Services (CMS), Office of Inspector General (OIG), Internal Revenue Service (IRS), and the Office of Civil Rights (OCR), Department of Health and Human Services (DHS), and Occupational Safety and Health Administration (OSHA); as well as other federal and state regulatory and business issues. The program fosters a culture of compliance by creating processes that detect and prevent fraud, waste, abuse, and policy violations while promoting quality of care.

### **Calvary Homes' Mission, Vision and Values are at the center of our Program.**

**Mission:** To serve senior adults, enriching their lives in a manner that glorifies our Lord Jesus Christ, and maximized their quality of life.

**Vision:** To be a community of faith that honors Jesus Christ throughout all living experiences and provides peace of mind to residents and their families.

**Values:** Integrity, Relationships of Respect, Teamwork, and Stewardship

This Code of Conduct (COC) has been adopted by Calvary Homes to provide standards by which staff will conduct themselves in order to protect and promote organization-wide integrity and to enhance Calvary's ability to achieve its mission. The COC is a component of our Compliance & Ethics Program, hereafter referred to the Program, and should be used jointly with those policy and procedures.

Compliance with the COC will be the responsibility of every Director, Officer, employee, contractor, vendor, or agent of Calvary Homes, hereafter referred to staff or employee.

Any questions regarding this COC or compliance policies and procedures should be directed to your supervisor and/or the Compliance Officer.

## Compliance and Privacy Officer

The Vice President of Health Services, serves as the Compliance and Privacy Officer. The Compliance Officer is responsible for coordinating, along with the Compliance Committee and the Board of Directors, the development, implementation, training, monitoring, and enforcement of activities related to the Compliance and Ethics Program. **Anyone who becomes aware of or suspect violations of the Code of Conduct that you report it immediately to your supervisor, a member of the Executive Leadership team, or the Compliance Officer.**

## Responsibilities

Calvary Homes expects its staff to complete required training and read, understand and abide by the policies and procedures in the Compliance & Ethics Program, including the COC applicable to their role. All staff shall refrain from conduct which may violate governing laws and regulations. Any employee who violates any of these standards and/or policies and procedures is subject to discipline up to and including termination.

Calvary Homes fosters a non-punitive environment and has zero-tolerance for retaliation. As an employee, you play a vital role in ensuring compliance with the Program. If you observe or suspect a situation that you believe to be unethical, illegal, fraudulent or in violation of Program, you must report it immediately. If you fail to report noncompliance you will be subject to discipline up to and including termination.

## Reporting

If you observe or suspect a situation that you believe to be unethical, illegal, fraudulent or a violation of the Program you must report the concern immediately using the following steps:

1. Report the concern to your supervisor.
2. If you are uncomfortable reporting directly to your supervisor or have already done so without resolution, speak to a Human Resources representative or a member of the Executive Leadership Team.
3. If your concern remains unresolved contact the Compliance Officer.

You may also report concerning activity **anonymously** via the Lighthouse hotline at:

- Telephone: 855-222-3387 (English) 800-216-1288 (Spanish)
- Website: [www.lighthouse-services.com/calvaryhomes](http://www.lighthouse-services.com/calvaryhomes)
- Email: [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name (Calvary Homes) in the report)
- Fax: (215) 689-3885 (it must include the company name “Calvary Homes” in the report)
- Anonymous Reporting App



iPhone Users



Non-iPhone Users

The Lighthouse hotline is available 24 hours a day, 7 days a week for individuals to report compliance-related concerns. The hotline is confidential and anonymous and you can report without fear of retaliation or punishment.

## Quality of Care

It is our responsibility to provide residents whom we serve with the necessary care and services so that they can attain or maintain the highest practical physical, mental, and psychosocial well-being, including but not limited to:

- Provide services to all persons regardless of race, color, creed, age, handicap, gender, national origin, marital status, or source payment;
- Provide appropriate and qualified staffing;
- Protect resident privacy and maintain appropriate records; and
- Ensure resident safety and provide person-centered care

## Resident Rights

Residents, have certain rights and protections under federal and state law that help ensure they receive appropriate care and services. Residents must be advised of their rights before or at the time of admission.

Resident Rights include:

- A dignified existence;
- Be treated with respect, kindness, and dignity;
- Be free from abuse, neglect, misappropriation of property and exploitation;
- Be free from corporal punishment or involuntary seclusion, and physical or chemical restraints not required to treat the resident's symptoms;
- Self-determination;
- Communication with and access to people and services, both inside and outside the facility;
- Exercise his/her rights as a resident of the facility and as a resident or citizen of the USA without interference, coercion, discrimination or retaliation;
- Be supported by the facility in exercising his/her rights;
- Be informed about his/her rights and responsibilities;
- Appoint a legal representative of his/her choice, in accordance with state law;
- Revoke the delegation of a legal representative, in accordance with state law;
- Exercise rights not delegated to a legal representative;
- Have his/her same-sex spouse afforded treatment equal to that of an opposite-sex spouse;
- Be notified of his/her medical condition and of any changes in his/her conditions;
- Be informed of, and participate in his/her care planning and treatment;
- Access personal and medical records pertaining to him/herself;
- Manage his/her funds, or have the facility manage his/her funds, upon request;
- Choose an attending physician and participate in decision-making regarding his/her care;
- Privacy and confidentiality;
- Voice grievances to the facility, or other agency that hears grievances, without discrimination or retaliation and without fear of discrimination or retaliation;
- Have the facility respond to his/her grievances;
- Examine survey results;
- Communicate with outside agencies regarding any matter;
- Work or not work;
- Perform services for the facility if he/she chooses, or refuse to perform services for the facility;
- Visit and be visited by other from outside the facility;
- Be informed of safety or clinical restriction or limitations of visitation;
- Access to a telephone, mail, and email; communicate with privacy;
- Retain and use personal possessions to the maximum extent that space and safety permit;
- Share a room with his/her roommate of choice, including a spouse, when practicable and mutually agreeable and to receive written communication, including a reason for changes;
- Self-administration medication, if the interdisciplinary team determines it is safe;
- Equal access to quality of care, regardless of source of payment;
- Reside and receive services in the facility with reasonable accommodation of resident needs and preferences except when to do so would endanger the health or safety of the resident or other residents;
- Refuse to transfer to another room in the facility, solely for the convenience of staff

## Abuse & Neglect Prevention

Our residents have the right to be free from abuse, neglect, misappropriation of resident property and exploitation. This includes but is not limited to freedom from corporal punishment, voluntary seclusion, verbal, mental, sexual and physical abuse and physical or chemical restraints not required to treat residents' s medical symptoms. Calvary Homes shall protect residents from abuse and neglect by staff, family, legal guardians/representatives, friends, or other persons. Any employee who witnesses or suspects abuse or neglect must **immediately** report to concern to their supervisor, Social Services, Healthcare Director of Nursing, Personal Care Home Administrator, or Vice President of Health Services. Please refer to Calvary Homes policy *Resident Abuse and Neglect Prevention Plan* for full details.

## Elder Justice Act

The Elder Justice Act (EJA) requires timely reports of reasonable suspicion of a crime against a resident in a long-term care facility. Any covered individual, including the owner, operator, employee, manager, agent or contractor of the facility is required to report reasonable suspicion of a crime against a Healthcare resident to the Pennsylvania Department of Health and local law enforcement immediately ***but no later than two (2) hours if the suspected crime involves serious bodily injury or within 24 hours if the suspected crime does not involve serious bodily injury.*** This reporting is required upon forming the suspicion regardless of where the event occurred, if a perpetrator can or cannot be identified and/or if the event is witnessed or unwitnessed. Upon receiving the report, the VP of Health Services (NHA) or designee is responsible to file the report with the appropriate agencies. Individuals may file a separate report if they wish, without informing the VP of Health Services of such report, however it is the policy of Calvary Homes that all staff report any allegations of abuse, neglect or crime against a resident immediately to Calvary Homes. Individuals who fail to fulfill their obligation are subject to discipline up to and including termination and legal consequences.

## Confidentiality and HIPAA

Calvary Homes staff shall strive to maintain the confidentiality of residents and other confidential information in accordance with applicable legal and ethical standards. Staff must use and disclosed medical, financial, or personal information on a **need-to-know** basis and only in the manner consistent with HIPAA Privacy policies and procedures. All release of medical records must be facilitated through the medical records department.

The use of confidential information obtained through or as a consequence of your relationship with Calvary Homes must be limited to the proper conduct of Calvary Homes operations. No individual may use or permit others to use such confidential information for the purpose of furthering a private interest or as a means of making a profit. Disclosures that result is a breach, will be investigated in accordance with all federal and state regulations.

## Discrimination

Calvary Homes shall comply with all applicable federal and state anti-discrimination requirements with respect to its admissions, team members, and provision of services.



## Human Resources and Employment Practices

Pre-employment screening is critical to ensuring and maintaining the integrity of Calvary Homes workforce and safeguarding the welfare of our residents. Calvary Homes shall only employ individuals with proper credentials, experience, and expertise and complies with all federal, state, and Equal Employment Opportunity (EEOC) laws. Calvary Homes shall conduct a reasonable and prudent background investigation and reference check prior to hiring individuals. Calvary Homes prohibits hiring, entering into a contract with or continued employment of anyone who are excluded or otherwise ineligible for participation in federal healthcare programs.

As long as you are employed or contracted with Calvary Homes, you must immediately report to Human Resources or your Calvary Homes contact:

- If you are arrested or indicted for a criminal offense;
- If you are convicted of an offense that would preclude employment in a healthcare facility;
- If action has been taken against your license or certification; or
- If you are excluded from participation in a federal or state healthcare program.

Calvary Homes strives to maintain an ethical and comfortable work environment, staff must;

- Refrain from any form of discriminatory treatment, harassment, including sexual harassment, intimidation or violence in the workplace;
- Treat all individuals with equal respect and dignity;
- Not supervise or be supervised by an individual with whom they have a close personal relationship and
- Behave professionally and use respectful communication at all times.

## Work Place Safety

Calvary Homes strives to create a safe environment for our team and residents. Every individual should become familiar with safety regulations and emergency plans regarding fire and disaster preparedness. In addition to organizational policies, Calvary Homes follows applicable laws and regulations. If you become aware of a safety concern and you can't immediately fix it you must report it to your supervisor.

### Drug and Alcohol Abuse

Calvary Homes prohibits employees/vendors from consuming any substance that impairs their ability to provide quality services or otherwise perform assigned duties. Employees/vendors may never use, sell, or bring onto our property alcohol, illegal drugs, and/or narcotics or report to work under the influence of such substances. Illegal, improper, or unauthorized use of any controlled substance that is intended for a resident is strictly prohibited. If you become aware of or suspect inappropriate activity you must immediately report the incident to your immediate supervisor. Failure to report noncompliance with this policy may result in disciplinary action up to and including termination.

## Business Ethics

Calvary Homes expects its employees/vendors to refrain from conduct that may violate federal and state laws, including federal tax law to maintain tax exempt status under section 501(c)(3) of the Internal Revenue Code.

### Proprietary Information

Calvary Homes confidential and proprietary information is valuable, and should be protected from unauthorized use or exploitation. This information should never be shared with anyone outside the organization without authorization from a member of the executive leadership team. Employees and vendors are expected to respect the intellectual property rights of others with whom we do business.

### Business Relationships

Calvary Homes is committed to fair competition among prospective vendors and contractors for our business. Arrangements between Calvary Homes and its vendors must always be approved by Calvary Homes President/CEO or Board of Directors. As required by the HIPAA rules, arrangements with vendors, who receive resident protected health information will include a Business Associate Agreement (BAA), to ensure that the business associates will appropriately safeguard such protected health information.

Vendors and Contractors must comply with this COC and Calvary Homes established policy and procedures, as well as the laws and regulations the set forth for their business or industry, including the Stark Law. Additionally, it is the vendor/contractor's responsibility to maintain applicable licenses, certifications, and documentation to ensure its workers are not excluded from participation in federal funding programs.

Calvary Homes complies with the Anti-Kickback Statute [42 U.S.C. § 1320a-7b(b)]. All resident referrals are accepted and reviewed in the same manner and based on our ability to provide the necessary care and services. Calvary Homes never solicits, accepts or gives anything of value in exchange for resident referrals or the generation of business involving any item or service payable by the Federal health care programs.

### Gifts

Calvary Homes prohibits its employees, Officers, Board, Corporation, or vendors from offering, giving, soliciting, or accepting excessive courtesies including entertainment and/or gifts that could be interpreted as attempts to influence decision making. Additionally, Calvary Homes expects all employees to render efficient and courteous service to all residents at all times without expectation of reward. To avoid even the implication of any impropriety, it is important that any cash or gifts be declined or redirected to Calvary Homes as a contribution.

In accordance with Health Insurance Portability and Accountability Act of 1996 (HIPAA), Calvary Homes prohibits its staff from offering or giving anything of value to prospective residents or any beneficiary of a federal or state healthcare program that will likely influence their selection of healthcare services.

### Conflict of Interest

It is the policy of Calvary Homes that all employee, Officers, Board, Corporation, and vendors must avoid potential conflicts of interest. A potential conflict exists when a Calvary Homes representative has an outside interest, direct or indirect, which interferes, or appears to interfere with the individual's duty to Calvary Homes or adversely affects the individual's judgement in performing responsibilities to Calvary Homes.

Employees, Directors and Officers who are considering election or appointment to corporate or community boards, public offices, or commissions, must ensure that serving in such capacity will not place them in a position where a potential conflict of interest may exist. Unless specifically approved by the Compliance Committee, no employee, Director or Officer shall serve on the board of directors of any health care entity or retirement community which is in direct competition with Calvary Homes. Should a conflict develop, Calvary Homes reserves the right to request the individual involved to divest him/herself of one of the conflicting interests.

A Calvary Homes employee shall not enter into a transaction or other arrangement with a resident without **prior** approval of the Compliance Committee. The Compliance Committee is responsible to review the proposed transaction or arrangement and ensure that it appropriate and does not result from any improper influence or other impropriety.

Calvary Homes prohibits unauthorized use of its name or logo by individuals to enhance political, investment, personal gains.

Except for a member of an individual's immediate family, no employee of Calvary Homes may accept an appointment as a legal agent (executor, administrator, power of attorney, guardian or trustee) of any Calvary Homes resident.

### Investigations and Audits

Calvary Homes policy is to cooperate with all governmental investigations and audits. Investigations are typically carried out to resolve specific allegations, complaints, or information concerning possible violations of law, regulation, or policy. Audits or evaluations are conducted to examine organizational program performance or financial management matters, typically of a systemic nature. We encourage employees, Officers, and vendors to cooperate with such requests in accordance with our policy and procedures:

- Ask for proper documentation to verify who you are speaking with;
- Be honest. Do not lie or make false or misleading statement to any investigator;
- Do not alter or destroy any Calvary Homes records or documentation;
- Notify the Calvary Homes Compliance Officer that you were contacted to provide a statement;
- Do not discuss the nature or content of the interview or request with anyone other than your attorney, including managers, other employees, other witnesses, or any party that is potentially involved in the investigation.
- Know your rights:
  - You have the right to speak to an attorney before answering any questions;
  - You have the right to have your attorney present during the interview;
  - You have the right to assert your Fifth Amendment right to refuse to provide information on the grounds that the information might be used against you in criminal proceedings

### Billing and Business Office Practices

Calvary Homes has a responsibility to ensure all billing statements and submissions to third party payors accurately reflect the services provided. It is our policy to bill only for covered services that are medically indicated, ordered by an authorized provider, actually rendered and fully documented in the medical record. Calvary Homes voluntarily reports known overpayments and/or inappropriate conduct within regulatory guidelines. False or inaccurate coding or billing is strictly prohibited. Any individual who **knowingly** falsifies clinical documentation, submits or attempts to submit a false claim is subject to disciplinary action up to and including termination and associated legal and/or criminal action.

**Individuals who fail to report suspicious activity will be subject to disciplinary action up to and including termination.**

### Protection of Assets

All employees must preserve and protect Calvary Homes assets and ensure their authorized and efficient use. Theft, carelessness, and waste have a direct impact on our viability. All assets must be used solely for legitimate business purposes, including, but not limited to the following:

- All transactions or conduct of Calvary business shall be properly documented
- Unrecorded funds, money, or other assets shall not be established or maintained
- False and/or fictitious entries in records or issuing false or misleading documents shall be prohibited
- Respect copyright and intellectual property laws. If unable to determine copyright or intellectual property status, never copy material and/or download software.

### Electronic Device/Internet Usage

Calvary Homes prohibits the use of its electronic devices and/or internet for improper or illegal activity or to download any applications without prior approval. Electronic devices may include, but are not limited to computers, tablets, or mobile phones. Internet usage can be tracked and how you use your time on our devices may be monitored. Therefore, you should have no expectation of privacy when you use our computers, email, or internet system. Individuals who violate the Code of Conduct in the digital, cyber, or non-face to face environment are subject Calvary Homes disciplinary action up to and including termination and law enforcement.