



WAVERLY HEIGHTS ETHICAL CODE OF CONDUCT DECLARATION

Waverly Heights trustees, employees, service providers and contractors will conduct all business in an ethical manner. We will maintain a high level of integrity and honesty in business conduct and will avoid any conduct that could reflect adversely on the integrity of Waverly Heights.

Confidentiality

We do not disclose or discuss information about residents or employees with others except as allowed or required by law. We do not violate the privacy rights of Waverly residents and employees.

Referrals

We do not pay for referrals of residents to Waverly Heights, nor do we accept payment for referring residents to hospitals, hospices or other facilities or organizations.

Billing and Medical Records

We maintain current and accurate medical records. We bill only for services that are actually provided and are medically necessary. We take care to assure that all billings to government, clients and private insurance payers reflect truth and accuracy and are in accordance with billing requirements for government programs and other third party payers.

Physicians

All business arrangements with physicians must ensure compliance with legal requirements and laws.

Relations with Government

We deal honestly with government officials. We comply with all federal, state, and local laws and are knowledgeable about them as they apply in our own field of expertise.

Record Keeping

We are responsible for the integrity and accuracy of Waverly Heights' documents and records.

Conflict of Interest

We avoid any conflict of interest that can affect the way we perform our duties. We comply with Waverly Heights policies on accepting gifts from residents, families, referral sources or vendors. We disclose any personal or business interests or relationships that may influence how we perform our duties.

Compliance with Antitrust and Tax Laws

We do not enter into agreements or understandings with a competitor that unlawfully limit or restrict competition, nor do we enter into agreements or understandings that restrict or limit the purchasing decisions of Waverly Heights. We comply fully with all federal and state tax laws.

Marketing

We will present Waverly Heights through its marketing activities in a manner consistent with its mission and capabilities. We will not engage in unethical or illegal marketing or advertising practices in connection with the offering of provision of health care services. We present truthful and non-deceptive information to potential residents and the community.

Human Resources

We will not employ nor contract with any individual who has been convicted of a criminal offense or is listed by a federal agency as debarred, excluded or otherwise ineligible to participate in federally funded health care programs. We will verify the credentials of physicians, nurses, and other health care professionals for providing services to residents.

Workplace Conduct

- We are committed to providing an equal opportunity work environment, treating everyone with fairness, dignity and respect.
- Each employee has the right to work in an atmosphere that is free of harassment.
- We are committed to ethical and lawful conduct.
- No error or deficiency should be ignored or covered up.
- We are committed to an alcohol and drug-free work environment.

Penalties and Discipline

Any employee, service provider or contractor who violates the Code of Conduct or performs unethical or illegal activities is subject to disciplinary procedures up to and including termination of employment or service agreement or contract.

No Retaliation

Waverly Heights will not permit any retaliation against any employee, service provider, contractor or any other person for reporting any violation of the Corporate Compliance policy or program.

Waverly Heights
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610-645-8600