

GARVEY MANOR Notification of Corporate Compliance Plan - Conflict of Interest Statement

BUSINESS AGENTS, ASSOCIATES, VENDORS, BOARD MEMBERS & PERSONS DOING BUSINESS WITH GARVEY MANOR

This notification is required because of the business relationship that exists between agents, associates, vendors, Board Members, and other persons doing business with Garvey Manor and Garvey Manor & Our Lady of the Alleghenies Residence (Garvey Manor). We are obligated to assure that individuals and entities who do business with Garvey Manor comply with our Corporate Compliance Plan, Conflict of Interest Policy and with Pennsylvania Department of Welfare's Bulletin 99-11-05 regarding 'Screening of employees and contractors for exclusion from participation in Federal Health Care Programs'.

A company or individual that acts contrary to or fails to disclose information not in accord with Garvey Manor's Corporate Compliance Plan, who has a Conflict of Interest, or who has been or has an employee who has been excluded from participation in Federal Health Care Programs will be considered to have violated our good faith business relationship, and also could be in violation of certain state or federal laws. This will result in severing the business relationship.

If an individual or company's response to any of the statements is the response preceded by the symbols ******, it is imperative that a contact is made with the Administrator at Garvey Manor to discuss if the continuation of the business relationship is appropriate.

1. The Garvey Manor Corporate Compliance Plan Summary is provided. It is the responsibility of agents, associates, vendors, Board Members, and other persons doing business to comply with the Plan as it relates to association with Garvey Manor.
2. An individual, agent, associate, vendor, company, the person in charge of company operations, the owner, or a representative of the company ever been convicted of a crime that relates to False claims; Anti-kickback; Stark Prohibitions; Health care fraud, false claims or statements, theft, embezzlement, obstructions of healthcare investigations, HIPAA, Older adult protective services, Medicare/Medicaid related crimes or exclusions. **** If the answer is YES, contact Garvey Manor immediately.**
3. An individual, agent, associate, vendor, company, the person in charge of company operations, the owner, or any person employed by or representing the company been convicted, excluded, debarred, or otherwise ineligible from participation in a federal program such as Medicare or Medicaid, or there are pending criminal charges relating to health care or a proposed exclusion from participation in any federally health care programs. ****If answer is YES, contact Garvey Manor immediately.**
4. Any actual or potential **CONFLICT OF INTEREST** that may exist between Garvey Manor and an individual, agent, associate, vendor, company, or the person in charge of company operations, the owner, or any representative of the business that would preclude the relationship from being compliant with standards or regulations. ****If answer is YES, contact Garvey Manor immediately.**
5. Any individual, agent, associate, vendor, company, the person in charge of company operations, the owner, and all representatives of the company agrees to comply with Garvey Manor's Compliance Policy as it relates to a business relationship. ****If answer is NO, contact Garvey Manor's Administrator immediately.**

Questions or concerns about an individual's or a company's continued business relationship with Garvey Manor based on the Corporate Compliance Plan or Conflict of Interest, should be directed to Garvey Manor's Administrator immediately.