

# GRAND TRAVERSE PAVILIONS

## Code of Conduct

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Grand Traverse Pavilions has always been committed to providing the best services possible to our constituents. As part of this, we must demonstrate consistently that we act with absolute integrity in the way we do our work, conduct our business and live our lives.

This Code of Conduct (the “Code”) provides guidance to ensure that our work is done in an ethical and legal manner. It emphasizes the shared common values which guide our actions. It contains resources to help resolve any questions about appropriate conduct in the work place. Please review it thoroughly. Your adherence to its spirit, as well as its specific provisions, is absolutely critical to our future.

If you have questions regarding this Code or encounter any situation which you believe violates provision of this Code, you should immediately consult your department supervisor or the Human Resources Director or designee. You have our personal assurance there will be no retribution for asking questions or raising concerns about the Code or for reporting possible improper conduct.

We are committed to the ideals in this Code of Conduct. We are equally committed to assuring that our actions consistently reflect our words. In this spirit, we want this Organization to be a family of men and women of shared values, and we expect all of our colleagues’ actions to reflect the high standards set forth in this Code of Conduct. No code of conduct can substitute for our own internal sense of fairness, honesty and integrity. We ask you to assist us and all of the colleagues in this Organization in supporting the values and principles which are critical to achieving our mission.

## Grand Traverse Pavilions Mission and Value Statements

- **Mission**  
To provide accessible, trusted, and compassionate care that enhances quality of life for aging adults.
- **Vision**  
To be region's trusted partner and recognized leader for successful aging services.

### Core Values

- **Collaboration**  
We believe the best environment relies on open communication, cooperation and inclusiveness which promote teamwork and accountability.
- **Compassion**  
We strive to deliver care in a most loving and empathetic manner as we would care for our own family.
- **Excellence**  
We strive to perform at the best of our abilities each day, seeking continuous learning opportunities and improvements that lead to best practices.
- **Innovation**  
We encourage curiosity, creativity, and resourcefulness to address our challenges.
- **Integrity**  
We strive for an atmosphere of mutual trust and respect in our dealings with our residents, their families, co-workers, volunteers, and vendors.
- **Positivity**  
We believe a vibrant and fun workplace inspires greater outcomes.
- **Security**  
We strive to provide a safe and secure environment for all persons to be free from harm and exploitation.
- **Servanthood**  
We strive to humbly serve our residents by meeting their medical and social needs.
- **Stewardship**  
As a public non-profit, we strive to be responsible in the use of our limited resources in a wise and efficient manner.

## **Purpose of Our Code of Conduct**

Our Code of Conduct provides guidance to all Grand Traverse Pavilions colleagues and assists us in carrying out our daily activities within appropriate ethical and legal standards. These obligations apply to our relationships with constituents, affiliated physicians, third-party payors, subcontractors, independent contractors, vendors, consultants, and one another.

This Code is a critical component of our overall Compliance Program. We have developed the Code to ensure that we meet our ethical standards and comply with applicable laws and regulations.

The Code is intended to be a statement that is comprehensive and easily understood. In some instances, the Code deals fully with the subject covered. In many cases, however, the subject discussed has so much complexity that additional guidance is necessary for those directly involved with the particular area to have sufficient direction.

## **Leadership Responsibilities**

While all Grand Traverse Pavilions colleagues are obligated to follow our Code, we expect our Administration to set the example, to be in every respect a model. They must help to create a culture within Grand Traverse Pavilions which promotes the highest standards of ethics and compliance. This culture must encourage everyone in the Organization to raise concerns when they arise. We must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

## **Relationships with Our Healthcare Partners**

### **Constituents**

#### Constituent Care and Rights

Our mission is to provide quality care and services to all of our constituents. We treat all constituents with respect and dignity and provide care that is both necessary and appropriate. We make no distinction in the care we provide based on race, color, religion, gender or national origin. Care is based on identified constituent healthcare needs, not on constituent or Organization economics.

We assure constituents' involvement in all aspects of their care and obtain informed consent for treatment. As applicable, each constituent or constituent representative is provided with a clear explanation of care including, but not limited to, diagnosis, treatment plan, right to refuse or accept care, care decision dilemmas, estimates of treatment costs, and an explanation of the risks and benefits associated with available treatment options.

Constituents and their representatives will be accorded appropriate confidentiality, privacy, and opportunity for resolution of complaints. Constituents are treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights, and involvement in their own care. Grand Traverse Pavilions colleagues will receive training about constituent rights in order to clearly understand their role in supporting them.

### Constituent Information

We collect information about constituents' medical condition, history, medication, and family illnesses to provide the best possible care. We realize the sensitive nature of this information and are committed to maintaining its confidentiality. We do not release or discuss constituent-specific information with others unless it is necessary to serve the constituent or required by law.

Grand Traverse Pavilions colleagues must never disclose confidential information that violates the privacy rights of our constituents. No Grand Traverse Pavilions colleague, or other healthcare partner, has a right to any constituent information other than that necessary to perform his or her job.

Constituents can expect that their privacy will be protected and that constituent-specific information will be released only to persons authorized by law or by the constituent's written authorization. In an emergency situation, when requested by an institution or physician then treating the constituent, the constituent's authorization is not required, but the name of the institution and the person requesting the information must be verified. This should be done as a call back process.

### **Third-Party Payors**

#### Coding and Billing for Services

We will take great care to assure that all billings to government and to private insurance payors reflect truth and accuracy and conform to all pertinent Federal and State laws and regulations. We prohibit any colleague or agent of Grand Traverse Pavilions from knowingly presenting or causing to be presented claims for payment or approval which are false, fictitious, or fraudulent.

We will operate oversight systems designed to verify that claims are submitted only for services actually provided and that services are billed as provided. These systems will emphasize the critical nature of complete and accurate documentation of services provided. As part of our documentation effort, we will maintain current and accurate constituent records.

### **Regulatory Compliance**

Grand Traverse Pavilions provides varied long term care services. These services generally may be provided only pursuant to appropriate Federal, state and local laws and regulations. Such laws and regulations may include subjects such as certificates of need, licenses, permits, accreditation, access to treatment, consent to treatment, medical record-keeping, access to medical records and confidentiality, constituent's rights, corporate

practice of medicine restrictions, and Medicare and Medicaid regulations. The Organization is subject to numerous other laws in addition to these healthcare regulations.

We will comply with all applicable laws and regulations. All colleagues, physicians, privileged practitioners, and contract service providers must be knowledgeable about and ensure compliance with all laws and regulations; and should immediately report violations or suspected violations to a supervisor or Human Resources Director or designee.

Grand Traverse Pavilions will be forthright in dealing with any billing inquiries. Requests for information will be answered with complete, factual and accurate information. We will cooperate with and be courteous to all government inspectors and provide them with the information to which they are entitled during an inspection.

During a government inspection, you must never conceal, destroy, or alter any documents, lie, or make misleading statements to the government representative. You should not attempt to cause another colleague to fail to provide accurate information or obstruct, mislead, or delay the communication of information or records relating to a possible violation of law.

In order to ensure that we fully meet all regulatory obligations, Grand Traverse Pavilions colleagues must be informed about stated areas of potential compliance concern. The Department of Health and Human Services, and particularly the Office of Inspector General, have routinely notified healthcare providers of areas in which these government representatives believe that insufficient attention is being accorded government regulations. We should be diligent in the face of such guidance about reviewing these elements of our system to ensure their correctness.

Grand Traverse Pavilions will provide its colleagues with the information and education they need to comply with all applicable laws and regulations.

## **Business Information and Information Systems**

### **Accuracy, Retention, and Disposal of Documents and Records**

Each Grand Traverse Pavilions colleague is responsible for the integrity and accuracy of our Organization's documents and records, not only to comply with regulatory and legal requirements but also to ensure that records are available to reflect and/or defend our business practices and actions. No one may alter or falsify information on any record or document. Medical and business documents and records are retained in accordance with the law and our record retention policy. Medical and business documents include paper documents such as letters and memos, computer-based information such as e-mail or computer files on disk or tape, and any other medium that contains information about the Organization or its business activities. It is important to retain and destroy records appropriately according to our policy. You must not tamper with records, nor remove or destroy them prior to the specified date.

### **Confidential Information**

Confidential information about Grand Traverse Pavilions operations is a valuable asset. Although you may use confidential information to perform your job, it must not be shared with others outside of Grand Traverse Pavilions unless the individuals have a legitimate need to know this information and have agreed to maintain the confidentiality of the information. Confidential information includes personnel data maintained by the

Organization, constituent lists and clinical information, pricing and cost data, information pertaining to affiliations, financial data, research data, strategic plans, marketing strategies, techniques, employee lists, and proprietary computer software.

This provision does not restrict the right of a colleague to disclose, if he or she wishes, information about his or her own compensation, benefits, or terms and conditions of employment.

### **Electronic Media**

Constituent or confidential information should not be sent through electronic mail or the Internet, except as required by state or Federal law or regulation. Colleagues who abuse our communications systems or use them for non-business purposes unless otherwise directed may be subject to disciplinary action.

## **Workplace Conduct and Employment Practices**

### **Conflict of Interest**

A conflict of interest may occur if your outside activities or personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract you from the performance of your job or cause you to use Grand Traverse Pavilions resources for other than Grand Traverse Pavilions purposes. It is your obligation to ensure that you remain free of conflicts of interest in the performance of your

responsibilities at Grand Traverse Pavilions. If you have any question about whether an outside activity might constitute a conflict of interest, you should obtain the approval of your supervisor before pursuing the activity.

### **Controlled Substances**

Some of our colleagues routinely have access to prescription drugs, controlled substances and other medical supplies. Many of these substances are governed and monitored by specific regulatory organizations and must be administered by physician order only. It is extremely important that these items be handled properly and only by authorized individuals to minimize risks to us and to constituents. If you become aware of the diversion of drugs from Grand Traverse Pavilions, you must report the incident immediately to your department supervisor or the Human Resources Director or designee.

### **Diversity and Equal Employment Opportunity**

Our colleagues provide us with a wide complement of talents which contribute greatly to our success. We are committed to providing an equal opportunity work environment where everyone is treated with fairness, dignity and respect. We will comply with all laws, regulations, policies and the Collective Bargaining Agreement (if applicable) related to non-discrimination in all of our personnel actions. Such actions include hiring, staff reductions, transfers, terminations, evaluations, recruiting, compensation, corrective action, discipline and promotions.

No one shall discriminate against any individual with a disability with respect to any offer, or term or condition, of employment. We will make reasonable accommodations to the known physical and mental limitations of otherwise qualified individuals with disabilities.

## **Harassment and Workplace Violence**

Each Grand Traverse Pavilions colleague has the right to work in an environment free of harassment. We will not tolerate harassment by anyone based on the diverse characteristics or cultural backgrounds of those who work with us. Degrading or humiliating jokes, slurs, intimidation, or other harassing conduct is not acceptable in our workplace.

Any form of sexual harassment is strictly prohibited. The prohibition includes unwelcome sexual advances or requests for sexual favors in conjunction with employment decisions. Moreover, verbal or physical conduct of a sexual nature that interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment has no place at Grand Traverse Pavilions.

Harassment also includes incidents of workplace violence. Workplace violence includes robbery and other commercial crimes, stalking cases, violence directed at the employer, terrorism, and hate crimes committed by current or former colleagues. As part of our commitment to a safe workplace for our colleagues, we prohibit colleagues from possessing firearms, other weapons, explosive devices, or other dangerous materials on

Grand Traverse Pavilions premises. Colleagues who observe or experience any form of harassment or violence should report the incident to their department supervisor or the Human Resources Director or designee.

Making or publishing of malicious, false, or vicious statements concerning residents or colleagues of the Organization may result in disciplinary action up to and including termination.

## **Health and Safety**

All Grand Traverse Pavilions facilities must comply with government rules and regulations and with Grand Traverse Pavilions policies or required Organization practices that promote the protection of workplace health and safety. Our policies have been developed to protect you from potential workplace hazards. You should become familiar with and understand how these policies apply to your specific job responsibilities and seek advice from your supervisor or the Human Resources Director or designee whenever you have a question or concern. It is important for you to advise your supervisor or the Human Resources Director or designee of any serious workplace injury or any situation presenting a danger of injury so that timely corrective action may be taken to resolve the issue.

## **License and Certification Renewals**

Colleagues and individuals retained as independent contractors in positions which require professional licenses, certifications, or other credentials are responsible for maintaining the current status of their credentials and shall comply at all times with Federal and State requirements applicable to their respective disciplines. To assure compliance, Grand Traverse Pavilions may require evidence of the individual having a current license or credential status.

Grand Traverse Pavilions will not allow any colleague or independent contractor to work without valid, current licenses or credentials.

## **Relationships with Subcontractors, Suppliers and Institutions**

We must manage our subcontractor and supplier relationships in a fair and reasonable manner, consistent with all applicable laws and good business practices. We promote competitive procurement to the maximum extent practicable. Our selection of subcontractors, suppliers and vendors will be made on the basis of objective criteria including quality, technical excellence, price, delivery, adherence to schedules, service, and maintenance of adequate sources of supply. Our purchasing decisions will be made on the supplier's ability to meet our needs and not on personal relationships and friendships. We will always employ the highest ethical standards and business practices in source selection, negotiation, determination of contract awards, and the administration of all purchasing activities.

## **Substance Abuse and Mental Acuity**

To protect the interests of our colleagues and constituents, we are committed to an alcohol and drug-free work environment. All colleagues must report for work free of the influence of alcohol and illegal drugs. Reporting to work under the influence of any illegal drug or alcohol, having an illegal drug in your system, or using, possessing, or selling illegal drugs while on Grand Traverse Pavilions work time or property may result in discipline up to and including discharge.

It is also recognized that individuals may be taking prescription drugs, which could impair judgment or other skills required in job performance. If you have questions about the effect of such medication on your performance, consult with your department supervisor.

## **Business Courtesies**

### **General**

Nothing in this part of the Code should be considered in any way as an encouragement to make, solicit, or receive any type of entertainment or gift. For clarity purposes, please note that these limitations govern activities with those not employed by Grand Traverse Pavilions. This section does not pertain to actions between the Organization and its employees nor actions among Grand Traverse Pavilions employees themselves.

### **Receiving Business Courtesies**

We recognize that there will be times when you may wish to accept from a current or potential business associate an invitation to attend a social event in order to further develop your business relationship. These events must not include expenses paid for any travel costs (other than in a vehicle owned privately or by the host company) or overnight lodging. The cost associated with such an event must be reasonable and appropriate. As a general rule, this will mean that the cost will not exceed \$100.00 per person.

Sometimes a business associate will extend training and educational opportunities that include travel and overnight accommodations to you at no cost to you or Grand Traverse Pavilions. Similarly, there are some circumstances where you are invited to an event at a vendor's expense to receive information about new products or services. Prior to accepting any such invitation, you should confirm that doing so is consistent with the corporate policy on this subject.

As a Grand Traverse Pavilions manager, you may accept gifts on behalf of the Organization with a total value of \$100.00 or less in any one year from any individual or organization who has a business relationship with Grand Traverse Pavilions. Employees of Grand Traverse Pavilions may accept individual gifts of nominal value, (under \$15.00) with approval from your supervisor from constituents or constituent family members or representatives. You may never accept cash or cash equivalents, such as gift certificates. Perishable or consumable gifts given to a department or group are not subject to any specific limitation. Finally, under no circumstances may you solicit a gift.

### **Extending Business Courtesies to Non-Referral Sources**

There may be times when you may wish to extend to a current or potential business associate (other than someone who may be in a position to make a constituent referral) an invitation to attend a social event in order to further or develop your business relationship.

The purpose of the entertainment must never be to induce any favorable business action. During these events, topics of a business nature must be discussed and the host must be present. These events must not include expenses paid for any travel costs (other than in a vehicle owned privately or by the host entity) or overnight lodging. The cost associated with such an event must be reasonable and appropriate. As a general rule, this will mean that the cost will not exceed \$200.00 per person. Moreover, such business entertainment with respect to any particular individual must be infrequent, which, as a general rule, means not more than quarterly, and preferably less often.

Also, Grand Traverse Pavilions may, from time to time, sponsor events with a legitimate business purpose. Provided that such events are for business purposes, reasonable and appropriate meals and entertainment may be offered. In addition, transportation and lodging can be paid for. However, all elements of such events, including these courtesy elements, must be consistent with the corporate policy on such events.

It is critical to avoid the appearance of impropriety when giving gifts to individuals who do business or are seeking to do business with Grand Traverse Pavilions. We will never use gifts or other incentives to improperly influence relationships or business outcomes. Gifts to business associates who are not government employees must not exceed \$200.00 per year per recipient. You may never give cash or cash equivalents, such as gift certificates. The corporate policy on business courtesies may, from time to time, provide modest flexibility in order to permit appropriate recognition of the efforts of those who have spent meaningful amounts of volunteer time on behalf of the Grand Traverse Pavilions.

United States Federal and State governments have strict rules and laws regarding gifts, meals, and other business courtesies for their employees. Grand Traverse Pavilions policy is to not provide any gifts, entertainment, meals, or anything else of value to any employee of the Executive Branch of the Federal government, except for minor refreshments in connection with business discussions or promotional items with the

Grand Traverse Pavilions logo valued at no more than \$10.00. With regard to gifts, meals, and other business courtesies involving any other category of government official or employee, you must determine the particular rules applying to any such person and carefully follow them.

## **Extending Business Courtesies to Possible Referral Sources**

Any entertainment or gift involving physicians or other persons who are in a position to refer constituents to our facilities must be undertaken in accordance with corporate policies. We will comply with all Federal laws, regulations and rules regarding these practices.

## **The Corporate Compliance Program**

### **Program Structure**

The Corporate Compliance Program is intended to demonstrate in the clearest possible terms the absolute commitment of the Organization to the highest standards of ethics and compliance. That commitment permeates all levels of the Organization. The Human Resources Director or designee oversees this process and there is a Corporate Compliance Committee and a Corporate Compliance Officer. These individuals are prepared to support you in meeting the standards set forth in this Code.

Members of the Corporate Compliance Committee are:

- Director of Certified Nurse Aides/Corporate Compliance Officer
- Finance Director
- Clinical Case Manager/Privacy Officer
- Director of Information Systems/Security Officer
- Billing
- Clinical Staff
- Medical Records

### **Resources for Guidance and Reporting Violations**

To obtain guidance on an ethics or compliance issue or to report a suspected violation, you may choose from several options. We encourage the resolution of issues at a local level whenever possible. It is an expected good practice, when you are comfortable with it and think it appropriate under the circumstances, to raise concerns first with your department supervisor. If this is uncomfortable or inappropriate, another option is to discuss the situation with the Human Resources Director or designee.

Grand Traverse Pavilions will make every effort to maintain, within the limits of the law, the confidentiality of the identity of any individual who reports possible misconduct. There will be no retribution or discipline for anyone who reports a possible violation in good faith. Any colleague who deliberately makes a false accusation with the purpose of harming or retaliating against another colleague will be subject to discipline.

### **Personal Obligation to Report**

We are committed to ethical and legal conduct that is compliant with all relevant laws and regulations and to correcting wrongdoing wherever it may occur in the Organization. Each colleague has an individual responsibility for reporting any activity by any colleague, physician, affiliate, subcontractor, or vendor that appears to violate applicable laws, rules, regulations, or this Code.

### **Internal Investigations of Reports**

We are committed to investigate all reported concerns promptly and confidentially to the extent possible. The Human Resources Director or designee will coordinate any findings from the investigations and immediately recommend corrective action or changes that need to be made. We expect all colleagues to cooperate with investigative efforts.

### **Corrective Action**

Where an internal investigation substantiates a reported violation, it is the policy of the Organization to initiate corrective action, including, as appropriate, making prompt restitution of any overpayment amounts, notifying the appropriate governmental agency, instituting whatever disciplinary action is necessary, and implementing systemic changes to prevent a similar violation from recurring in the future at Grand Traverse Pavilions.

### **Discipline**

All violators of the Code will be subject to disciplinary action. The precise discipline utilized will depend on the nature, severity, and frequency of the violation and may result in any of the following disciplinary actions:

- Counseling memorandum
- Verbal warning
- Written warning
- Suspension
- Termination
- Performance Improvement Plan

### **Internal Audit and Other Monitoring**

Grand Traverse Pavilions is committed to the aggressive monitoring of compliance with its policies. Much of this monitoring effort is provided internally. However, in certain departments, the manager is expected to routinely conduct internal audits of issues that have regulatory or compliance implications. The Organization also routinely seeks other means of ensuring and demonstrating compliance with laws, regulations, and Grand Traverse Pavilions policy.

### **Acknowledgment Process**

Grand Traverse Pavilions requires all colleagues to sign an acknowledgment confirming they have received the Code and understand it represents mandatory policies of Grand Traverse Pavilions. New colleagues will be required to sign this acknowledgment as a condition of employment.

Adherence to and support of Grand Traverse Pavilions' Code of Conduct and participation in related activities and training will be considered in decisions regarding hiring for all candidates and colleagues and discipline up to and including termination.

### **Non-Substantiative Document Changes**

Grand Traverse Pavilions, from time to time, may find it necessary to make non-substantiative changes to this document. Should this occur, employees will be notified via regular employee communication avenues of such, so they may review or obtain a copy of the changes.



## **Grand Traverse Pavilions**

### **CODE OF CONDUCT ACKNOWLEDGMENT**

I certify that I have received and read Grand Traverse Pavilions' Code of Conduct and hereby agree to abide by the specific provisions, requirements, policies and procedures referenced therein. I further understand that, as an employee of Grand Traverse Pavilions, I will strive to comply with all applicable laws, rules and regulations and will, at all times, display the utmost integrity and moral conduct and fulfill my responsibilities in an ethical manner.

I have had an opportunity to ask questions about the information contained in the Code of Conduct and understand that it is my responsibility to contact my department supervisor or the Human Resources Director or designee if, in the future, I have any questions regarding my obligations and responsibilities as stated in the Code of Conduct.

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Signature

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Name (Printed)

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Date

08/08/2023