

PACE North

Code of Conduct

PACE North is committed to providing the best services possible to our Participants. 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 Executive Director. 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.

PACE North Mission, Vision, and Value Statements

Our Mission

Through our holistic and coordinated healthcare services, provided with dignity and compassion, we enhance the quality of life and independence of aging adults.

Our Vision

To be the recognized leader for innovative, community-based long-term care and support services.

Core Values

- **Quality** - We support our participants in remaining functionally independent for as long as possible by meeting their medical and social needs.
- **Safety** - We strive to keep all participants, employees, and contractors free from harm.
- **Compassion** - We strive to deliver loving and empathic care to our participants as we would care for our own families.
- **Integrity** - We strive for an atmosphere of mutual trust and respect in our dealing with our participants, their families, other agencies, contractors, volunteers, and employees.
- **Collaboration** - We entrust our interdisciplinary team and contracted providers work together in our participant's best interest.
- **Community** - We believe that families and communities benefit from maintaining individuals outside of institutions through the end of life.

Purpose of Our Code of Conduct

The Code of Conduct provides guidance to all PACE North colleagues and assists us in carrying out our daily activities within appropriate ethical and legal standards. These obligations apply to our relationships with Participants, affiliated physicians, third-party payers, 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 PACE North 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 PACE North 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 Participants

Participant Care and Rights

We treat all Participants 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 Participant needs, not on Participant or Organization economics.

We assure Participants' involvement in all aspects of their care. As applicable, each Participant or Participant 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, and an explanation of the risks and benefits associated with available treatment options.

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

Participant Information

We collect information about Participants' 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 Participant-specific information with others unless it is necessary to serve the Participant or required by law, or written Participant authorization has been received.

PACE North colleagues must never disclose confidential information that violates the privacy rights of our Participants. No PACE North colleague, or other healthcare partner, has a right to any Participant information other than that necessary to perform his or her job.

Regulatory Compliance

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 the Executive Director.

PACE North 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, PACE North colleagues must be informed about stated areas of potential compliance concern. The Michigan Department of Health and Human Services (MDHHS), Center for Medicare and Medicaid (CMS), and particularly the Office of Inspector General (OIG), 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.

PACE North will provide its colleagues with the information and education they need to comply with all applicable laws and regulations.

Accuracy, Retention, and Disposal of Documents and Records

Each PACE North 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 PACE North operations is a valuable asset. Although you may use confidential information to perform your job, it must not be shared with others outside of PACE North 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, participant 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

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

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 the Organization and to our Participants. If you become aware of the diversion of drugs from PACE North, you must report the incident immediately to your supervisor or the Executive Director.

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.

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 PACE North. This section does not pertain to actions between the Organization and its employees nor actions among PACE North 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 PACE North. 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.

PACE North management 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 PACE North. With supervisor approval, employees of PACE North may accept individual gifts of nominal value, (under \$15.00) from a Participant, family member, or Participant representative. 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 participant 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, PACE North 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 PACE North. We will never use gifts or other incentives to improperly influence relationships or business outcomes. 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 PACE North.

Extending Business Courtesies to Possible Referral Sources

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

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 immediate supervisor. If this is uncomfortable or inappropriate, another option is to discuss the situation with the Executive Director.

PACE North 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 Executive 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 PACE North.

Discipline

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

Internal Audit and Other Monitoring

PACE North is committed to the aggressive monitoring of compliance with its policies. Much of this monitoring effort is provided internally. However, in certain departments, the supervisor is expected to routinely conduct internal audits of issues that have regulatory or compliance implications.

Acknowledgment Process

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

Adherence to and support of PACE North' 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.

Document Changes

PACE North, from time to time, may find it necessary to make changes to this document. Should this occur, employees will be notified via regular employee communication avenues so they may review or obtain a copy of the changes.