

## **Our Commitment to Ethics and Integrity<sup>1</sup>**

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Our vision is something we aspire to in the not-so-distant future: Personalized health made simple, affordable and exceptional. When we reach it, we will have accomplished something so significant it changes the way people feel about us forever.

The way people feel about us is a reflection of you. Your mindset. Your words and actions. Living our values for each other and those we serve with respect and honesty is a privilege that makes our profession more special than any other job on earth.

Our Code of Excellence sets clear expectations for our shared commitment to ethics and integrity. It is intended to help each of us make the best decisions possible and provide an exceptional experience for every individual. It is foundational to our mission, and the great work we do to improve health, inspire hope and save lives.

Everything good that matters at Spectrum Health starts with you. I am grateful and proud of your unwavering support for doing what's right for everyone, everywhere, every day.

*Tina*

*Tina Freese Decker, President & CEO*

## **Our Values**

Compassion – To respect and love everyone, everywhere, every day.

Collaboration – To partner with others for better results.

Curiosity – Ask why. Wonder aloud.

Courage – Be bold. Ask for and give help.

## **To Whom Does the Code of Excellence Apply?**

This Code of Excellence (Code) applies system-wide to all employed and non-employed team members (collectively referred to as team members) including providers, contractors, consultants, agents, students, volunteers and vendors.

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<sup>1</sup> This revised system wide Code of Excellence was approved by Christina Freese Decker, President & CEO, November 17, 2020. [Board Resolution Single COE 6-24-14](#).

## Our Code of Excellence

1. **We do the right thing.** We do the right thing no matter if anyone notices or is watching. This includes conducting ourselves in accordance with our values – *compassion, collaboration, curiosity and courage* – and complying with all laws and regulations governing our business. We acknowledge that it isn't always easy to do the right thing. If we are unsure of the right thing to do, we ask for help.
2. **We make sure everyone has a voice.** We raise concerns and instances of actual or potential ethical or compliance issues. We do not allow retaliation against anyone seeking help or raising a concern in good faith.
3. **We treat everyone with compassion, dignity and respect.** We will serve everyone in our communities, without regard to race, color, sex, national origin, handicap/disability, age, HIV status, marital status, sexual orientation, gender identity, gender expression, religious beliefs, sources of payment for care or other protected status or category. We work to create environments free of harassment, violence and intolerance.
4. **We value diversity, equity and inclusion.** We embrace a diverse and inclusive organizational culture that fosters respect for all. At the same time, we acknowledge that inequities persist in our communities. We pledge to listen deeply and engage authentically with those impacted by systemic racism, so we can partner with others toward the goal of achieving health equity.
5. **We maintain a healthy workplace.** We act in safe and healthy ways and do our jobs with clear minds.
6. **We are good stewards of our resources.** These resources include our people, facilities, funding, information, technology, equipment, and supplies. We use them responsibly, and ensure that others do, too. We share them or allow others access to them only for legitimate business purposes and with proper authorization.
7. **We code and bill our services appropriately.** We strive to ensure and maintain complete and accurate documentation of medical services provided. We expect accurate coding from our provider partners. We report and return any overpayment once identified from a government health care program, commercial payor, or patient.
8. **We are transparent with quality and pricing.** We give clear and accurate information as it relates to charges for the items and services we provide. We proactively share information about the quality of our care, the outcomes of our services, and the experiences of our patients and members. We attempt to answer questions and resolve disputes related to our services to the patient's, member's and payer's satisfaction.
9. **We protect the confidentiality and privacy of our patients and members.** We collect information about a patient's and member's medical condition, history, medication and family illnesses to provide the best possible care and health plan services. We protect individuals' health information while allowing the flow of information needed to provide and promote high quality health care.
10. **We are honest, accurate and fair in our business relationships.** We provide truthful, accurate information to the public, news media, and others who have an interest in our activities, including those conducting external audits, reviews and inspections. We follow our policies and principles of good business ethics pertaining to the exchange of gifts and business courtesies with vendors. We address potential conflicts of interest before they arise, and when they do arise, we manage them through disclosure and removing the individual(s) with the conflict from decision-making related to the interest or matter.



## How Can I Report a Concern?

You can report a concern in several ways. Our Integrity Helpline is available 24 hours a day, seven days a week. An outside company receives calls and online submissions. The Compliance Department receives the report and reviews for follow-up or investigation. All contacts are confidential, to the limit allowed by law. If you prefer, you can make an anonymous report. Providing as much information as possible will help us review the validity of the report and investigate any potential misconduct.

Spectrum Health Integrity Help Line  
877.319.0266  
[spectrumhealth.alertline.com/gcs/welcome](https://spectrumhealth.alertline.com/gcs/welcome)

Priority Health Integrity Help Line  
\*for providers, vendors, agents and members  
800.560.7013

You can always contact the Chief Compliance Officer or your division's Compliance & Privacy Officer.

Leah A. Voigt, JD, MPH  
Chief Compliance Officer  
Spectrum Health System  
[Leah.Voigt@spectrumhealth.org](mailto:Leah.Voigt@spectrumhealth.org)  
616.391.3998

Chris Kuhlmann  
Compliance & Privacy Officer  
Spectrum Health Lakeland  
[Christopher.Kuhlmann@spectrumhealth.org](mailto:Christopher.Kuhlmann@spectrumhealth.org)  
269.985.4600

Carrie Miedema  
Compliance & Privacy Officer  
Spectrum Health West Michigan  
[Carrie.Miedema@spectrumhealth.org](mailto:Carrie.Miedema@spectrumhealth.org)  
616.267.7518

Cindy Rollenhagen  
Compliance & Privacy Officer  
Priority Health  
[Cindy.Rollenhagen@priorityhealth.com](mailto:Cindy.Rollenhagen@priorityhealth.com)  
616.464.8424

Spectrum Health Compliance Department  
<https://spectrumhealth.sharepoint.com/sites/office-of-organizational-integrity-compliance/compliancedepartment@spectrumhealth.org>  
616.486.2430



# Spectrum Health System

## Code of Excellence Acknowledgment

I acknowledge the following to demonstrate my commitment to our Code of Excellence (Code):

- I understand that it is my responsibility to review and be familiar with the Code’s contents and all related policy statements within the Code.
- I understand my obligation to seek guidance when unsure of the proper course of action and report concerns and suspected violations of the Code or other policies applicable to me, to a member of leadership, human resources, compliance, or the Integrity Help Line.
- I agree to comply with the standards contained in the Code and all related policies and procedures as part of my continued employment or association with Spectrum Health. This includes a commitment to a work environment that is free of harassment and promotes equal opportunities for all team members.
- I understand that I do not retaliate against another person for raising a concern or reporting a suspected violation.
- I understand that any breach of the Code or other policies applicable to me subjects me to performance correction up to and including termination of employment or other relationship with Spectrum Health.
- I confirm that I am not currently excluded from participation in Medicare, Medicaid or any other federal or state health care program. I understand that it is my responsibility to immediately disclose to the compliance department any current or future federal or state program exclusion or another event that makes me ineligible to perform work related directly to federal or state health care programs.
- I confirm that I have not been affiliated in the past 5 years with any other non-Spectrum Health entity as an owner, Officer, Director, General Partner, individual with operational or managerial control, or reassigned my Medicare billing privileges to another Medicare provider, who:
  - Currently has an uncollected debt to Medicare, Medicaid, or the Children’s Health Insurance Program (“CHIP”);
  - Has been or is subject to a payment suspension under a federal health care program;
  - Has been or is excluded by the Office of Inspector General from participation in Medicare, Medicaid, or CHIP; or
  - Has had its Medicare, Medicaid, or CHIP enrollment denied, revoked or terminated.
- I will inform my leader of potential conflicts of interest that I may encounter so that they may be properly addressed.

Name

Date

Team member ID

Signature