

Corewell Health Code of Excellence

Our Commitment to Ethics and Integrity

What we do and how we do it matters. As a health system, we have the ability to help people live healthier lives. Through our daily actions and interactions, we can help people feel respected, understood and loved.

Our Code of Excellence sets clear expectations for our shared commitment to caring for others with the highest professional standards of ethics and integrity. It is intended to help each of us make the best decisions possible and provide an exceptional experience for every individual.

By embracing and living this Code, each of us contributes to a culture of trust and transparency, innovation and continuous improvement, compassion and generosity. Each of us helps establish our system as one that welcomes all, encourages everyone to contribute, and is dedicated to solving the tough issues our patients and health plan members encounter.

I am grateful for your commitment to doing what's right for everyone, everywhere, every day. And I am proud and honored to reimagine the future of health with you.



Tina Freese Decker
President & CEO, Corewell Health



Corewell Health Code of Excellence

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 suppliers.

- 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, adhering to all professional standards for responsible and ethical business practices 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 we evaluate them through a fair and just culture. We do not allow retaliation against anyone seeking help or raising a concern in good faith. When human error happens, we support our team members through a non-punitive response.
- 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 promote a positive work environment for everyone. 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 true and accurate information to the public, regulatory agencies, news media, and others who have an interest in our activities. We engage in social media in a way that is truthful and respectful of others. We follow our policies and principles of good business ethics pertaining to the exchange of gifts and business courtesies with suppliers. 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 help lines are 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.

Corewell Health Trust Line 877.319.0266

spectrumhealth.alertline.com/gcs/welcome



Corewell Health East Trust Line 800.805.2283

www.Trustline.Alertline.com



Corewell Health South Integrity Help Line 877.319.0266

spectrumhealth.alertline.com/gcs/welcome



Corewell Health West Integrity Help Line 877.319.0266

spectrumhealth.alertline.com/gcs/welcome



Priority Health Integrity Help Line 800.560.7013

*for providers, vendors,
agents and members

You can always contact the following team members:

Corewell Health Leah A. Voigt, JD, MPH

Chief Compliance Officer
Leah.Voigt@spectrumhealth.org
616.391.3998

Corewell Health East Kelly Partin

Sr. Director, Compliance
& Corporate Privacy
Kelly.Partin@beaumont.org
947.522.3069

Corewell Health South Chris Kuhlmann

Compliance & Privacy Officer
Christopher.Kuhlmann@spectrumhealth.org
269.985.4600

Corewell Health East Gina Arnett Thompson, JD, RN

Chief Compliance Officer
Gina.ArnettThompson@beaumont.org
947.522.3304

Corewell Health West Carrie Miedema

Compliance & Privacy Officer
Carrie.Miedema@spectrumhealth.org
616.267.7518

Priority Health Cindy Rollenhagen

Compliance & Privacy Officer
Cindy.Rollenhagen@priorityhealth.com
616.464.8424

Corewell Health 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 Corewell Health and its regions. 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 Corewell Health and its regions.
- 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-Corewell 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: _____