



CORPORATE COMPLIANCE AND YOU

YOUR ROLE AND RESPONSIBILITY

PURPOSE

- ❑ Affirm Pathway's commitment to our mission of providing quality retirement services to Masonic family members and the communities in which they live
- ❑ Promote an ethical workplace
- ❑ Ensure all standards are met/policies and applicable laws followed
- ❑ Prevent, detect and report civil, criminal, and administrative violations under the Social Security Act including fraud/abuse of the system.
- ❑ Educate all staff, volunteers, representatives on their role in the Compliance program
- ❑ Create a workplace where all representatives of Pathways are comfortable participating in the compliance program without fear of retribution.
- ❑ Self-Policing program: are we following our policies, procedures, regulations, laws, etc
- ❑ We strive to provide quality services in a manner that is in full compliance with all applicable laws and regulations.
- ❑ We value honesty, integrity, and respect in all business matters.

WHAT DOES THAT HAVE TO DO WITH ME?

- ❑ All staff members of all departments and other Masonic Pathways Representatives in our organization are expected to maintain a standard of behavior that is both lawful and ethical.
- ❑ Anyone with knowledge of facts concerning Pathway's activities that they believe might violate the law has an obligation to promptly report the matter to their supervisor or corporate integrity officer.



LAWS/REGULATIONS AND RULES ARE EVER CHANGING..HOW DO I STAY COMPLIANT?

- ❑ Follow Employee Code of Conduct. Treat all residents and representatives with respect, and dignity.
- ❑ Follow Facility Policies and Procedures...if you don't know, ask or look-up.
- ❑ Attend education sessions that relate to your job role.
- ❑ Report any known or suspected compliance issues.
- ❑ Strive to prevent errors and provide suggestions for change to eliminate errors.



CODE OF CONDUCT

- ❑ Lists facility principles with standards to provide more specific guidance to administrative/managerial staff

1. Legal Compliance: document what services were provided; refrain from political lobbying which can compromise facility tax exempt status; zero tolerance for harassment and discrimination.

CODE OF CONDUCT (CONT)

2. Business Ethics: Honest communication, maintain confidentiality
3. Gifts: prohibited from soliciting tips/gifts
4. Protect Facility Assets: effective use of resources, properly report who item is for when indicated; refrain from personal use of facility property.

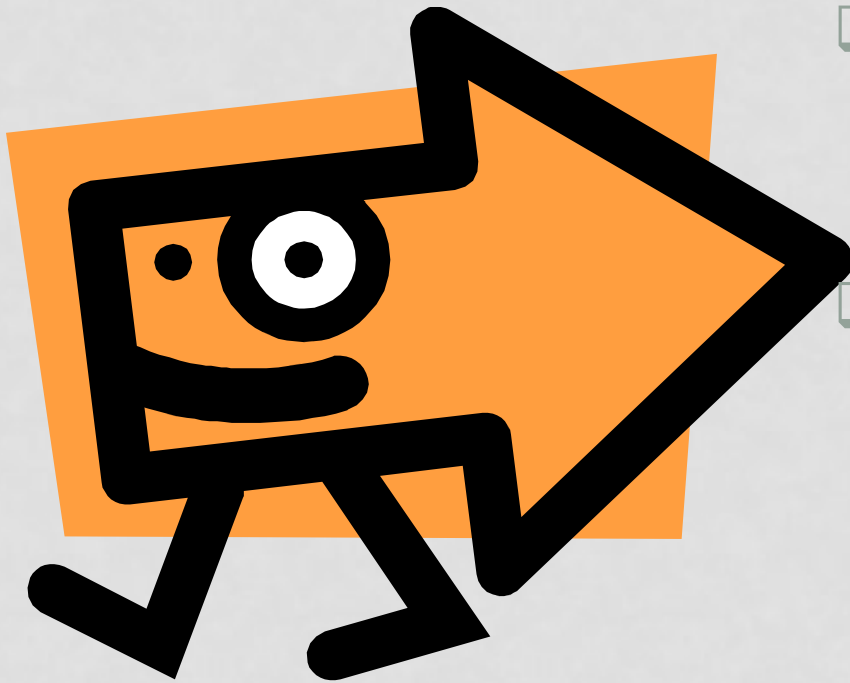
SPECIAL AREAS OF COMPLIANCE CONCERN

- ❑ Quality of Care: Each resident has a comprehensive care plan based on assessment; appropriate services including therapy and assistance with ADL's provided as care planned
- ❑ Residents' Rights: Non-discriminatory admission policy; environment free from abuse, corporal punishment and involuntary seclusion, avoidance of chemical and physical restraints, access to clinical records, resident's right to participate in their care
- ❑ Billing: only for services rendered and necessary, ensuring MDS coded correctly

SPECIAL AREAS OF CONCERN (CONT)

- ❑ Employee Screening: Criminal Background Checks; ensure that employees, contractors, physicians etc have not been charged with offenses related to any Federal or State health care program; verify participation/exclusion status
- ❑ Kickbacks, Anti-Trust Laws: gifts of more than nominal value cannot be accepted or offered to or from residents, referral sources, and other business partners; Ensure open competitive bidding process (avoid collusion/bid rigging, and exclusive dealing)

VIOLATIONS OF POLICIES AND PROCEDURES THAT APPLY TO CORPORATE COMPLIANCE ISSUES IN MOST CASES:



- Can be reported through your chain of command
- Staff/Student >>> Supervisor >>> Manager >>> Director >> Administration

THERE ARE ALSO OTHER MEANS OF REPORTING

- ❑ 2 methods of reporting confidentially

- ❑ HOT LINE NUMBER

989-466-4693 can be used either from inside or outside of the building- no caller ID, you do not have to leave any identification

- ❑ LOCKED CORPORATE COMPLAINT BOXES

- ❑ The intent is to provide the opportunity to report anything witnessed that does not follow our mission, vision, values, policies/procedures; behavior that may lead to fraud or abuse of a healthcare system/government entity etc

FEDERAL FALSE CLAIMS ACT

You are protected

Under no circumstances will there be retaliation against the person making the report



CORPORATE COMPLIANCE OFFICER

- ❑ Vicki Ritz, COO & Corporate Compliance Officer X 3855
- ❑ Responsible for investigation of any suspected violation
- ❑ Any mistreatment, physical, mental or financial abuse, neglect either real or suspected
- ❑ Allegations or acts of misappropriation of residents property
- ❑ **Suspected abuse or neglect does not fall under Corporate Compliance rules of hotline or compliance box use for reporting.**
- ❑ **Any suspected abuse or neglect must be reported immediately to a supervisor.**

SAFETY GUIDELINES

- ❑ The safety of our residents, staff and visitors is of the utmost importance

- ❑ WEAPONS ARE NOT ALLOWED IN MASONIC PATHWAYS LICENSED FACILITIES

- ❑ These include but are not limited to:

- ❑ Guns, knives- including jack knives and pocket knives, and explosives

PREVENTING WORKPLACE VIOLENCE

If you see something say something (supervisor, 911, security alert)

- Strange person in building
- Co-worker in domestic violence situation (most workplace violence is person not associated directly with organization)
- Anything that doesn't feel/seem right
- If ever there was a threat from a stranger insisting that you give them medications or they will cause harm – give the meds and call 911 immediately. Do not risk your life or anyone else's to protect the meds.

RECOGNIZING SIGNS OF POTENTIAL WORKPLACE VIOLENCE



Alert HR if you believe an employee exhibits potentially violent behavior. Indicators of potentially violent behavior may include one or more of the following actions:

- Increased use of alcohol and/or illegal drugs
- Unexplained increase in absenteeism and/or vague physical complaints
- Depressed and/or withdrawn behaviors
- Increased severe mood swings & noticeable, unstable emotional responses
- Increased references to problems at home
- Increased unsolicited references to or comments about violence, firearms, or other dangerous weapons and violent crimes

WORK RELATED INJURIES

- Employees have responsibility to report any injury that occurs at work/on the premise.
- Report the day of injury, by the end of your shift**
- Report to supervisor; fill out appropriate paperwork
- Appropriate treatment will be provided
- We want to know about injuries even if you do not require treatment; allows us to put interventions in place to prevent re-occurrence