



## **GSIL CODE OF CONDUCT ACKNOWLEDGEMENT**

### **CODE OF CONDUCT, April 2016**

Please read the following statements and sign below to indicate your receipt and acknowledgement of the GSIL Code of Conduct.

- I have received and read a copy of the GSIL Code of Conduct, April 2016.
- I understand these policies, terms, conditions and agree to abide by them. I may seek clarification from Human Resources for any reference in this document.
- GSIL may change, correct, modify, or revoke any of the principles and policies discussed in this document at any time with or without notice.
- This document is *not* a contract. Nothing contained in this document is intended to create, nor should be interpreted to create, any additional employment rights for any GSIL personnel or alter the employee at will relationship that exists between the organization and its employees.

Date: \_\_\_\_\_

Name: \_\_\_\_\_

Signature: \_\_\_\_\_



Granite State  
Independent Living



*Tools for Living  
Life on Your Terms*

# Code of Conduct

**GRANITE STATE INDEPENDENT  
LIVING**

April 2016

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The principles and standards discussed in this document have been approved by Granite State Independent Living (GSIL) Executive Leadership and Board of Directors. GSIL may change, correct, modify, or revoke any of the principles and policies discussed in this document at any time with or without notice, and will let its officers, employees, vendors, contractors, volunteers and others know about such changes as quickly as possible.

This document is *not* a contract. Nothing contained in this document or in the employee handbook or any organizational policies is intended to create, nor should be interpreted to create, any additional employment rights for any GSIL personnel. This document is intended as guidance only.

The principles or standards included in this document are intended to apply to all employees, officers, directors, independent contractors, volunteers and entities representing or doing business for GSIL.

## **GSIL Code of Conduct**

An organization's reputation for integrity is its most valuable asset and is determined by the conduct of its board members, officers, and employees, as well as agents, and attorneys. Each must manage his or her personal and business affairs in order to avoid situations that might lead to a conflict or even suspicion of a conflict between his or her self-interest and his or her duty to the organization and its customers. A person's position at Granite State Independent Living (GSIL) must never be used, directly or indirectly, for private benefit for himself or herself, a member of his or her family (i.e., related by blood or marriage), or any other person. Each member of the board, officer, and employee, as well as agents, and attorneys, must meet high standards of integrity and ethical conduct. This document does not address every potential issue. If you have a question concerning a specific proposed transaction, discuss it with any of the following: your supervisor, Human Resources, the Compliance Officer or the Chief Executive Officer (CEO).

At GSIL, we operate in accordance with all applicable laws, regulations, and standards. This code of Conduct puts into writing standards that exist in various policies and procedures at GSIL and requires formal acknowledgment by all staff and board members. More detailed departmental and organizational policies can be found on the Intranet.

We lead by example, collaborate, and inspire each other. While the GSIL Board of Directors and Executive Leadership have the ultimate responsibility for ensuring that GSIL operates at the highest ethical levels, all GSIL personnel agree to understand and comply with all aspects and principles of this Code of Conduct. We firmly believe that this understanding and commitment is at the heart of our work, so compliance is a condition of employment.

If something does not seem right, each of us has the ethical, and often legal, responsibility to seek guidance. If you are not sure about what to do in a particular situation; ask questions. As a valued staff member committed to honoring GSIL's standards, you need to understand your responsibility to:

Communicate, perform, and document with honesty, integrity and with the highest ethical standards.

Follow the principles set forth in this document, all organizational policies, as well as the laws and regulations under which GSIL operates.

Ask questions if you are not sure about what is appropriate.

Report or disclose any questionable situations promptly to the Compliance Officer, Human Resources or your supervisor. GSIL encourages you to report legal, regulatory, policy, safety and Code of Conduct violations without fear of retaliation or reprisal.

## Our Values

### *At Granite State Independent Living...*

*we believe in the importance of mutual Respect.*

*we believe that everyone should have Choices.*

*we believe that everyone has the right to be Empowered.*

*we believe that everyone can and should be able to choose their own level of Independence.*

*we believe that everything we do must be done with Integrity.*

*we believe in Collaboration.*

## **Workforce Conduct**

GSIL is an excellent place to work because we care deeply about our mission, our consumers and their families, and each other. Employees of GSIL perform their duties competently and reliably and conduct themselves in a professional, ethical, and responsible manner that promotes a spirit of cooperation and teamwork among employees that is respectful of consumers, volunteers, and members of the public with whom we interact.

### ***Confidentiality***

GSIL personnel have access to confidential and/or proprietary information as well as confidential information obtained from external entities. All GSIL personnel must be mindful of confidentiality in all their interactions and at all times during the course of their employment. Employees protect consumer and business information by keeping it confidential and making sure it is used only as intended and on a need to know basis.

We all have a legal right to confidentiality. We protect that right because it's the law and it is the right thing to do. Our consumers trust us to protect their privacy. GSIL personnel protect consumer information- *whether it is electronic, verbal, or paper* - from those who do not need access, including fellow employees whose job duties do not require that they be given that information, as well as business associates. Employees shall not discuss confidential information in public places nor leave sensitive information unattended.

All employees will adhere to Health Insurance Portability and Accountability Act (HIPAA) regulations in regards to the sharing of any personal medical information concerning consumers and staff in accordance with signed Associate Agreements for external entities. Dissemination of personal or contact information, including photographs of associates, consumers, or staff requires the individual's consent. GSIL personnel may not access consumer information for any reason other than to obtain the information that is necessary for the staff member to provide the needed services or to comply with properly executed requests. Any other access to confidential, consumer information is not permitted.

In order to maintain the confidentiality and integrity of confidential information, information sent through the internet should only be sent in accordance with

### **CONDUCT QUESTION**

**You are in the hallway with four other individuals. You overhear an employee begin to tell another employee some details about a consumer's condition. What should you do?**

Discussing consumer information in a public area violates the individual's right to confidentiality. If this should happen, try to remedy the situation at hand by reminding coworkers of the need for confidentiality with a comment like, "Please talk about this in private."  
To report a breach of confidentiality, talk to your supervisor; the Compliance Officer or Human Resources.

electronic media and information security policies and standards, which require, among other things, that the information be encrypted.

**Protection of assets**

GSIL provides quality work locations including office supplies, computers, e-mail, facsimile, voice mail, intranet, internet access, telephones, and other communications equipment (aka Communications Systems) as essential tools to support our business and to deliver quality services. All communications systems are assets of the organization and are to be used primarily for business purposes and in accordance with GSIL’s policies governing the appropriate use of information and communications systems. We protect all assets from misuse, waste, theft, fraud, loss, disclosure, removal or disposal.

**CONDUCT QUESTION**

**Can I write my term paper for school on my work computer?**

*Possibly. If you use the computer during non-working hours (i.e., on your **own** time) and in limited circumstances, you may be permitted to type personal documents. Always check with your supervisor first.*

It is the responsibility of each employee to ensure that communications systems and technology is used for proper business purposes and in a manner that does not compromise GSIL’s proprietary or sensitive information, nor the confidentiality of consumers, employees, or members.

It is also the responsibility of each employee to ensure that personal electronics do not interfere with productivity or performance.

In addition, it is the policy of GSIL to pay all employees for time worked in an accurate and timely manner, in accordance with all applicable Federal and State labor laws. Employees found to be improperly reporting work time and attendance, including falsifying time, which means not working the time recorded, will be subject to disciplinary action up to and including termination.

**Bribery, gratuities, improper payments and contract awards**

GSIL personnel uphold the highest standards of personal integrity. Any bribe, kickback, gratuity, or other payment attempting to influence a business decision or to achieve a business result is improper and unlawful. Receiving anything of value from a third party that is intended to influence business decisions or activities is not allowed. Likewise, neither GSIL employees nor anybody representing the organization should consider offering anything of value to a third party, including a government official, in an effort to influence that party or to gain preferential treatment for GSIL.

**Gifts**

GSIL employees shall not solicit or accept any gift, loan, gratuity or any item in excess of nominal monetary value (*generally \$25 or less*) for personal benefit directly or indirectly from any person or organization currently or seeking to conduct business with GSIL. Honorariums such as gift cards or pens typically given for participation on panels and plaques /certificates of appreciation are permitted. events of reasonable value are acceptable. A gift should never be accepted if there are conditions attached Personal gifts from consumers are not allowed. Meals and attendance at general client-appreciation.

Employees are prohibited from:

- a. Accepting a gift from any person seeking a relationship with GSIL. This rule does not apply to (i) food or entertainment of nominal value; (ii) advertising or promotional materials of nominal value; (iii) awards by civic or charitable organizations; (iv) gifts of nominal value.
- b. Sell anything at a price in excess of its worth nor should he or she purchase anything from a customer at a price below its worth;
- c. Accept a gift from attorneys, accountants, insurance brokers or agents, stock brokers, real estate agents and the like for the referral of customers.

### **Entertainment**

GSIL personnel are guided by common sense and moderation when entertaining anybody with whom GSIL does business. Before acting, ask yourself: is it clearly related to your job, reasonable under the circumstances, and would GSIL reimburse you for the cost if you were giving, rather than receiving, the entertainment? Properly completed and approved expense reports/reimbursement requests must be completed for such activities.

### **Conflicts of interest**

A conflict of interest is any act or activity which is beneficial to any employee, his or her family (related by blood or marriage), or any entity in which he or she has a direct or indirect interest and which is detrimental or contrary to the interests of the organization.

GSIL expects our employees to conduct business according to the highest ethical standards of conduct. Employees are expected to devote their best efforts to the interests of GSIL. The ever-changing business environment may create a conflict between the interests of GSIL and an employee that are unacceptable. GSIL recognizes the right of employees to engage in activities outside of their employment which are of a private nature and unrelated to our business. However, the employee must disclose any possible conflicts of interest so that GSIL may assess and prevent potential conflicts of interest from arising. A potential or actual conflict of interest occurs whenever an employee is in a position to influence a decision that may result in a personal gain for the employee or an immediate family member (i.e., spouse or significant other, children, parents, siblings) as a result of GSIL's business dealings.

Each Employee is responsible for dealing fairly with GSIL in business and personal transactions and ensuring that his or her own interests do not adversely affect the organization. Care must

## **CONDUCT QUESTION**

### **Can I accept free tickets to a major sports event or theatrical production?**

*No, not if this constitutes a lavish gift, outside the guidelines of reasonable and appropriate under the circumstances of your job.*

*If the tickets are being offered by a consultant, or vendor, such a gift might also be interpreted as an incentive - or bribe - to secure your business or interest. (See the Gifts & Honorarium Policy for additional information.)*

be taken that all transactions are conducted appropriately and that conflicts of interest are avoided. An Employee must ensure, however, that he or she does not abuse his or her position for personal benefit at the expense of the organization. He or she should take appropriate precautions in structuring business and personal ties to GSIL to avoid even the appearance of inappropriate conduct.

Any employee who is aware of a conflict of interest or is contemplating any act or activity which may be a potential conflict of interest should disclose the act or activity to the CEO in writing and seek approval before continuing or proceeding with the act or activity.

***Examples of conflicts of interest that should be disclosed include:***

- Working for a person or company that may interfere with your ability to provide loyal services to GSIL or interfere with your quality of work quality.
- Having a financial interest in a business seeking to establish a relationship with GSIL.
- Purchasing services, goods or property from a family member on behalf of GSIL.

***Proper accounting practices***

In order to prudently manage GSIL's resources for continued financial stability and strength, GSIL personnel must properly maintain records so that all financial reports and statements accurately reflect GSIL's business activities. Revenues and expenditures applicable to organization operations are recorded and accounted for properly so that accounts and reliable financial and statistical reports may be prepared and accountability of the assets may be maintained. Financial information is maintained and reported according to generally accepted accounting practices (GAAP).

***Communications with governmental agencies, regulators and legal counsel***

All employees, officers, and directors must respond honestly and candidly when dealing with GSIL's independent and internal auditors, regulators, and attorneys. The honesty and integrity guiding GSIL relationships often include contact with governmental agencies and their representatives. GSIL personnel should immediately report to the Director of Quality & Compliance or Executive Leadership any contact with a government/regulatory agency that does not occur in the normal course of duties to receive further guidance. These contacts may include a request for information or other inquiry about GSIL or organizations with which GSIL does business, informal "off-the-record" discussions, or the receipt of a subpoena or service of legal process.

## **Quality of Program Services**

### ***Quality of services***

The quality of services delivered by GSIL is measured in numerous ways. We focus on attentiveness and dedication in providing high quality services to consumers and understand the concept of consumer direction as we strive to perpetuate an overall culture that keeps consumer safety, providing choice and promoting independence as paramount. GSIL is committed to the delivery of quality consumer directed services with a focus on accountability and transparency.

This commitment to delivering high quality services is an obligation of all GSIL personnel. Personnel are encouraged to engage in process improvement work within and across departments seeking to improve the impact our services make with our consumers. We want to do a better job at supporting our consumers' desires to achieve the goals that they have set for themselves. GSIL provides consumer services without regard to race, color, religion, age, disability, sex, sexual orientation, genetics, national origin, marital status or any other classification protected by law. When someone has a question about whether these commitments are being fully addressed, GSIL personnel are obligated to raise concerns through appropriate channels until it is satisfactorily addressed and resolved. Such channels include the reporting processes established by our Executive Leadership, safety committee, Human Resources and the Compliance Officer.

### ***Consumer satisfaction***

At GSIL, we are committed to delivering high quality services. This requires that we listen and take the time to understand needs and explain things clearly. We regularly communicate with consumers and ask them to complete consumer satisfaction surveys.

### ***Respecting consumers' personal values and beliefs***

GSIL respects each consumer's values and beliefs. We encourage consumers to make and exercise their own choices to the extent consistent with the plan of care and consistent with the law and applicable GSIL policies and procedures.

### ***Informing Consumers of their rights***

When an individual becomes a consumer, GSIL provides a statement of their rights and responsibilities as a consumer of our services.

### ***Ethics and boundaries***

It is expected that all officers, employees and agents of GSIL will demonstrate the highest ideals of honor and integrity in all public and professional relationships to merit the respect, trust and confidence of clients, consumers, public officials, and the community.

**Examples include:**

- Not condoning or being a party to any illegal or improper activity.
- Not discriminating on the basis of race, religion, creed, age, marital status, national origin, gender, genetic makeup, physical or mental disability or any other reason.
- Not accepting fees, gifts or other valuable items for personal gain in the course of performing the duties and responsibilities of one's position or office.
- Not directly, or indirectly, seeking or accepting personal gain which would influence or appear to influence the conduct of one's duties.
- Not using GSIL property or resources for personal gain.

**Treatment of Employees Consumers and Associates**

GSIL treats all employees, applicants for employment, consumers, associates and other personnel fairly and equitably.

***Nondiscrimination and equal opportunity***

GSIL adheres to the principle of equal employment opportunity to ensure that applicants and employees are treated without regard to their race, color, religion, sex, ancestry, age, sexual orientation, genetics, national origin or physical or mental disability and that the provisions of the Civil Rights Act of 1964, Vietnam-era veteran status, Sections 503 and 504 of the Rehabilitation Act, Genetic Information Nondiscrimination Act of 2008, and the Americans with Disabilities Act and of 1990 are followed as well as other applicable laws and regulations. This includes but is not limited to: employment, promotion, demotion, transfer, layoff, recall, corrective action/dismissal, recruitment, advertising, rate of pay and other forms of compensation, application of policies, training and all GSIL programs and services. GSIL will continue to take active measures to ensure that personnel actions; compensation and employee benefits are fairly and equitably applied in conformity with state and federal laws.

GSIL strongly encourages minority group members, veterans, and persons with disabilities to apply for positions for which they are qualified. The primary purpose of the organization is to encourage independence of people with disabilities; therefore GSIL will proactively seek to hire qualified candidates with disabilities. Qualified candidates will not be discriminated against because of individual needs. Reasonable accommodations will be made.

If you have experienced or witnessed any discrimination, report it promptly. If you are uncomfortable for any reason in bringing a matter to the attention of your supervisor/department head, you should immediately contact the VP of Human Resources, the COO or the CEO.

***Workplace Safety and Professional Work Environment***

The board and management of GSIL recognize the importance of safety and health in the workplace and are committed to providing a work place for employees which is safe. We realize that our employees are the greatest resource we have as an organization, and we

strongly encourage safety, health and wellness practices in everything we do. GSIL provides a safe, secure and positive work environment for all. This includes an environment free of violence. All individuals on GSIL premises or while representing GSIL conduct themselves in a professional manner consistent with good business practices, including non-offensive language, for example, sexual or political comments that could be offensive to others, and in conformity with non-violence principles and standards. Threats of aggression/violence, either verbal or physical are not tolerated. GSIL restricts the possession of weapons to “Authorized” persons such as safety/law enforcement personnel.

### ***Harassment***

GSIL is committed to the principle that no employee, applicant, consumer or business associate should be subject to harassment of any kind including sexual harassment. GSIL strives to provide a work environment that promotes equal opportunity and one free from illegal discriminatory practices. Harassment by anyone based on the diverse characteristics or cultural backgrounds of those who work with us also includes degrading jokes, slurs, intimidation, or other harassing conduct. Acts of disruptive behavior, sexual harassment or other forms of harassment are not tolerated under any circumstances. Report concerns to your supervisor, department manager or Human Resources. (Refer to GSIL Policies & Procedures)

### ***Use of illegal drugs or being under the influence of drugs or alcohol while at work***

GSIL is committed to maintaining a workplace free from the influence of alcohol or drugs in order to protect the health, safety and well-being of our consumers and personnel. GSIL expects personnel to arrive for work and remain in a condition to carry out one’s responsibilities; which includes being free of the influence or effects of alcohol or drugs and being mentally stable to work properly and perform normal work duties. The transfer and sale of alcohol, legal or illegal drugs on premises owned or operated by GSIL, and while operating any vehicle or equipment while working, is not allowed. Legally prescribed drugs for the employee are permitted, subject to certain reasonable standards that may be imposed from time to time relative to drugs that have the potential to have an adverse impact on work or performance. Moderate, responsible consumption of alcoholic beverages at GSIL sponsored events, where GSIL has authorized alcoholic beverages to be served, is allowed, in keeping with other applicable GSIL policies and procedures.

## **Compliance with the Law**

Every person associated with GSIL is expected to obey the law. Previous sections of this Code have addressed laws and regulations pertinent to the topic discussed. The following are other laws applicable to GSIL.

### ***False claims***

GSIL personnel accurately record information submitted to parties inside and outside GSIL. No false or misleading information is included in any record or report submitted to GSIL management, any outside party or government agency to the best of our knowledge. Fraud is defined as an intentional act of deception or misrepresentation committed for financial gain or

other benefit and is to be reported immediately when suspected. These acts require an element of intentional wrongdoing or deception. The individuals reporting such acts are protected from retaliation. (Refer to GSIL Whistleblowers Policy). This includes, but is not limited to, timesheets that are used to provide the number of hours worked to bill Medicaid. Employees need to accurately complete the timesheet with only the time they worked in a consumer’s home doing the tasks that are on the consumer’s care plan.

It is a federal and state crime to file false claims and/or reports with the Centers for Medicare & Medicaid Services (CMS) or with any other state or federal program. All GSIL personnel are extremely careful to ensure that all billing is done in strict compliance with all policies and procedures and is properly coded. If you have any questions about proper billing or coding procedures or rules, or become aware of any situation where a false or inaccurate claim may have been submitted, contact your supervisor/department head, Human Resources or the Compliance Officer immediately.

*Examples of false claims include:*

- Billing of items or services that were never rendered.
- Billing for hours that are not authorized in a care plan.

Refer to GSIL policies governing submission of claims, billing, reimbursement and other regulations such as whistle-blower protection, for further guidance.

### ***Lobbying and political contributions***

Federal law prohibits tax-exempt organizations from participating in certain lobbying and political activities, directly or indirectly. As a result, no GSIL personnel can give any GSIL funds, property, or services to or on behalf of any candidate, campaign committee, or political party or organization with a campaign. This restriction also covers indirect support of candidates or political parties. Examples of prohibited activities include using GSIL funds to purchase tickets for political dinners or advertisements in campaign brochures and using GSIL assets such as stationery, supplies, postage stamps or copying machines to support a political candidate or cause. GSIL has registered lobbyists who represent the organization’s interests.

This principle is not meant to affect your personal right to make political contributions from your own money or engage in political activity on your own time. Soliciting or campaigning for candidates on GSIL property is prohibited.

## **Marketing and Public Affairs**

Marketing and public affairs activities at GSIL are conducted with truth, accuracy, fairness and responsibility to consumers, the community and the public-at-large and freedoms guaranteed to the media by law. GSIL regularly receives requests from reporters writing stories about disability, health care, Medicaid and other issues including our consumers’ experiences. Our policy is to cooperate with these media requests by providing reporters with timely and accurate information. Disclosure of information to representatives of the media is governed by the GSIL Media Policy which requires referring questions to the CEO, COO or the Communications Director. (Refer to Media Policy)

***Employees should:***

**Be** polite, helpful and immediately refer the request to our Communications department.

**Don't** respond directly to a reporter's questions, give out information, or talk with the reporter "off the record" or "on background".

## **Resources/Assistance**

For assistance with any concerns/questions you may have about compliance issues you should contact any of the following:

**Compliance Officer:** at 603-410-6508.

**Director of Quality & Compliance:** at 603-410-6521

**Vice President of HR:** at 603-410-6506

## **Reporting Concerns**

*How do I report a compliance concern?*

- Discuss any potential violation or compliance issue with your immediate supervisor/department manager. Any quality and safety concern may also be discussed with the Director of Quality/ Compliance.
- Report your concern to the Human Resources Director or V.P., Compliance Officer, or the Quality/Compliance Director.
- If you feel a member of GSIL Executive Leadership or its Compliance Officer has done something wrong, you can report it directly to the Chair of GSIL's Board of Directors. Call GSIL at 1-800-826-3700 or 603-228-9680 to obtain the Chair's phone number.

## **Enforcement**

GSIL encourages the use of the various means indicated in this document and GSIL policies to report any concerns relative to noncompliance. Neither GSIL nor any GSIL staff member may retaliate against another person who has conscientiously made a report in good faith.

Employees may be subject to corrective action (up to and including termination) for violating, or failing to report a violation in accordance with policies and procedures. Such corrective action will be in accordance with the relevant compliance policies and GSIL's human resources policies.

This document is not a contract. Nothing contained in this document or in any policies included in this document is intended to create, or should be interpreted to create, any additional employment rights for any GSIL employees. This document is intended as guidance only.

**The integrity of our organization begins with you!  
Integrity is everyone's responsibility.**