

# TeamHealth Compliance Program

TeamHealth's Compliance and Ethics Program is consistent with the Office of Inspector General's compliance program guidance and the elements of an effective compliance and ethics program set forth in the organizational sentencing guidelines.

The following is a high level summary of TeamHealth's Compliance and Ethics Program. **If you have questions or concerns, contact the Compliance Team during normal business hours (8:30a.m. - 5:30p.m. ET) at 865.293.5317.**

## Oversight

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The following individuals and groups have compliance oversight responsibilities:

**Chief Compliance Officer:** Overall leadership of our Compliance and Ethics Program is provided by the chief compliance officer. The chief compliance officer reports directly to the chief executive officer and the board of directors through the board's compliance committee.

**Designated Compliance Officer:** We have two vice presidents of compliance who are assigned as the designated compliance officers for various service lines. The designated compliance officers, with the support of the compliance team, provide day-to-day compliance oversight of assigned service lines to ensure the compliance and ethics program is implemented and operating in accordance with our compliance policies and procedures. The designated compliance officers report directly to the chief compliance officer.

**Chief Privacy Officer:** The chief privacy officer provides company-wide leadership, oversight and guidance related to the Health Insurance Portability and Accountability Act (HIPAA) and other federal and state privacy regulations. The chief privacy officer reports directly to the chief compliance officer.

**Chief Information and Security Officer:** The chief information and security officer provides company-wide leadership, oversight and guidance related to TeamHealth's Enterprise Information Security Program. The chief information and security officer reports directly to the chief information officer.

**Board Compliance Committee:** The board compliance committee (BCC) is a sub-committee of the company board of directors. The BCC provides board level oversight and support for the Compliance and Ethics Program. Most BCC members are independent directors who meet with the chief compliance officer at least four times a year.

**Executive Compliance Committee:** The executive compliance committee consists of senior leaders and provides executive level oversight and support for the Compliance and Ethics Program. The committee meets with the chief compliance officer at least quarterly.

## Written Standards and Procedures

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**Code of Conduct:** The code of conduct is periodically reviewed and updated. All new associates are required to review the code of conduct as part of the orientation process. Thereafter, any updates to the code of conduct are shared with associates during annual compliance and ethics training.

**Compliance Policies and Procedures:** Compliance policies and procedures are periodically reviewed and updated. All new associates are introduced to compliance policies during new associate training. New policies or changes to existing policies are included in annual compliance and ethics training.

## Training

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**New Associate Training:** All new associates receive one hour of compliance and ethics training as part of the orientation process.

**Annual Training:** All associates receive at least one hour of compliance and ethics training annually.

**Other Compliance Training:** Additional compliance and ethics training is provided as needed.

## Auditing and Monitoring

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Compliance auditing and monitoring activities are memorialized in the annual compliance work plan. The annual compliance work plan is updated each year based on the results of the annual risk assessment.

## Anonymous Reporting Mechanisms

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Associates and independent individuals can anonymously seek guidance or report suspected violations of the Compliance and Ethics Program 24/7 by calling the toll free hotline at 888.315.2362 or reporting online at [teamhealthcompliance.com](http://teamhealthcompliance.com). All concerns are immediately routed to the compliance team for review and investigation.

## Investigations

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All concerns regarding potential or actual violations of the Compliance and Ethics Program are investigated by a member of the compliance team in conjunction with other needed subject matter experts.

## Corrective/Disciplinary Action

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If it is determined that a violation of the Compliance and Ethics Program has occurred, appropriate and necessary corrective and/or disciplinary action is taken, including mitigating the risk of future similar instances.

## Non-Retaliation

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Retaliation or intimidation against associates for good faith reporting of known or suspected violations of our Compliance and Ethics Program is prohibited. Any associate who engages in or condones retaliation or intimidation in any way will be subject to disciplinary action, up to and including termination.

## Excluded Individuals or Entities

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TeamHealth will not employ or contract with any individual or entity excluded from participating in any federal or state health care program. This includes debarment, suspension, sanction or any other action making an individual or entity ineligible to participate (including revocation of enrollment and billing privileges) in any federal or state healthcare program or in federal procurement or nonprocurement programs.