

# TeamHealth Compliance Program Summary Description

TeamHealth has developed a company-wide Compliance and Ethics Program. The TeamHealth Compliance and Ethics Program is structured to be 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 the elements of TeamHealth's Compliance and Ethics Program. If you have a question or a concern, please feel free to contact the Compliance Team during normal business hours (8:30 a.m. – 5:30 p.m. EST) @ 865-293-5317.

## **Oversight**

The following individuals, and groups of individuals, have compliance oversight responsibilities:

**Chief Compliance Officer** – Overall leadership of our Compliance and Ethics Program is provided by our Chief Compliance Officer. The Chief Compliance Officer reports directly to our Chief Executive Officer and the Board of Directors through the Board's Compliance Committee.

**Designated Compliance Officers** – We have two Vice Presidents of Compliance who have been assigned as the Designated Compliance Officers for our various service lines. The Designated Compliance Officers, with the support of the Compliance Team, provide the day-to-day compliance oversight of their assigned service lines to ensure that the Compliance and Ethics Program has been implemented and is 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 relating to the Health Insurance Portability and Accountability Act ("HIPAA") and other federal and state privacy regulations.

**Chief Information and Security Officer** – The Chief Information and Security Officer provides company-wide leadership, oversight and guidance relating to the Company's Enterprise Information Security Program.



**Board Compliance Committee** – The Board Compliance Committee ("BCC") is a sub-committee of our corporate Board of Directors. The BCC provides board level oversight and support for our Compliance and Ethics Program. A majority of the BCC members are independent directors and they meet with the Chief Compliance Officer at least four times a year.

**Executive Compliance Committee** – We have established a committee consisting of our senior leaders to provide executive level oversight and support of the Compliance and Ethics Program. The committee meets with the Chief Compliance Officer at least quarterly.

**Compliance Advisory Group** – The Compliance Advisory Group is a sub-committee of the Executive Compliance Committee. The primary function of the Compliance Advisory Group is to advise and assist the Compliance Team on policies, risk areas, and operationalizing the Compliance and Ethics Program. This committee consists of leaders from our various service lines and they meet with the Compliance Team at least quarterly.

#### **Written Standards and Procedures**

**Code of Conduct** – We have developed a Code of Conduct that is periodically reviewed and updated, as needed. As part of the orientation process, all new Associates are required to review the Code of Conduct. Thereafter, any updates to the Code of Conduct are shared with our Associates during annual Compliance and Ethics training.

**Compliance Policies and Procedures** – We have developed compliance policies and procedures that are periodically reviewed and updated, as needed. All new Associates are introduced to our compliance policies during the new Associate training process and new policies, or changes to existing policies, are included in annual Compliance and Ethics training.

## **Training**

**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**

Compliance auditing and monitoring activities are memorialized in our Annual Compliance Work Plan. The Annual Compliance Work Plan is updated each year based upon the results of the annual risk assessment.

## **Anonymous Reporting Mechanisms**

Associates and independent individuals alike can anonymously seek guidance or report suspected violations of the Compliance and Ethics Program 24/7 by calling our toll free Hotline 888-315-2362 or online @ <a href="www.teamhealthcompliance.com">www.teamhealthcompliance.com</a>. All concerns are immediately routed to the Compliance Team for investigation.

## **Investigations**

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

# **Corrective/Disciplinary Action**

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

#### **Non-Retaliation**

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**

We will not employ or contract with any individual or entity that has been excluded from participating in any Federal or State health care program. This includes debarment, suspension, sanction, or any other action that makes an individual or entity ineligible to participate (including revocation of enrollment and billing privileges) in any Federal or State health care program or in Federal procurement or nonprocurement programs.