

A Guide to the Lifespan Corporate Compliance Program and Code of Conduct

Every employee, manager and physician plays a vital role in realizing Lifespan's mission of providing customer friendly, geographically accessible and high value services to the communities we serve. Essential to achieving this mission is Lifespan's continuous commitment to conduct its business activities in an ethical manner. As such, knowledge of and continued adherence to the Lifespan Corporate Compliance Program is of the utmost importance.

The Lifespan Corporate Compliance Program is a system-wide initiative consisting of a code of conduct, general compliance policies, internal monitoring, employee training and an employee response line. Designed to minimize Lifespan's risk of violating federal and state regulations, the Corporate Compliance Program addresses issues from billing and claims, to patient confidentiality, to employees' rights. These policies and standards are not a new philosophy of complying with the law, but rather a daily reminder of Lifespan's commitment to being a responsible corporate citizen.

It is your responsibility to comply with the program, to use sound and ethical judgment and to report any suspected violation of law or ethical principle. Suspected violations can be confidentially reported without fear of retaliation by:

- Talking with the manager of your department.
- Contacting an executive corporate compliance committee member.
- Calling the confidential employee response line at 1-888-678-5111.
- Calling the corporate compliance officer at 401-444-4728.
- Sending a confidential e-mail to the corporate compliance officer via Lifespan's intranet at <http://intra.lifespan.org/compliance/EmailForm.htm>

This brochure has been developed to help you better understand the code of conduct and the general compliance policies that support the code and the Corporate Compliance Program. If you would like additional information on the code of conduct and the policies, please visit the Corporate Compliance Program website at <http://intra.lifespan.org/compliance/index.htm>

Your ongoing commitment and support of the Corporate Compliance Program will enable Lifespan to continue to be a health care leader.

Sincerely,



George A. Vecchione
President and Chief Executive Officer

About Lifespan's Corporate Compliance Program

The Corporate Compliance Program began in the late 1990's in response to the changing health care environment. The Corporate Compliance Program establishes compliance standards and procedures for detecting, preventing and reporting violations of laws and professional regulations.

The mission of the Lifespan Corporate Compliance Program is:

To develop, implement and maintain a system-wide program designed to ensure awareness of, and adherence to, federal and state laws, rules and regulations.

In order to accomplish this mission, the program sets forth in policy reasonable methods for the Lifespan community to follow to achieve continued compliance and aims to resolve detected violations in a fair, ethical and consistent manner. As an example, it requires all employees, managers and professional staff to report suspected violations or improper business practices to Lifespan leadership or the Lifespan corporate compliance office.

Components of Lifespan's Corporate Compliance Program

Lifespan's Corporate Compliance Program includes a code of conduct and numerous supporting policies to ensure compliance with all government rules and regulations.

The code of conduct defines the standards of conduct which all employees, managers and members of the professional staff are expected to follow; it requires that they:

- Comply with all applicable federal and state laws and regulations and professional standards governing Lifespan's operations and delivery of health care services regardless of whether such laws, regulations, or standards are specifically mentioned in Lifespan's corporate compliance policies, or some other Lifespan policy.
- Maintain their knowledge of such laws, regulations and professional standards, relating to their specific responsibilities, by attending educational and training programs offered either by Lifespan or other parties.
- Conduct themselves in accordance with the code of conduct and supporting corporate compliance policies; failure to do so is not authorized by Lifespan, is inconsistent with Lifespan standards for employees and professional staff members and may result in progressive disciplinary actions up to loss of employment or curtailment of privileges.
- Review Lifespan's Corporate Compliance Manual periodically to familiarize themselves with the corporate compliance policies; additionally, employees, as part of the annual performance evaluation process, must acknowledge their understanding of and adherence to the Lifespan Corporate Compliance Program; and active medical staff, during the credentialing process, must attest to their knowledge of and

adherence to the corporate compliance program and its policies.

- Report any apparent or threatened violations of any Lifespan policy or any applicable law, regulation, or standard of conduct to their supervisor, senior management or the corporate compliance office. Lifespan will not take any adverse action against any person or party reporting in good faith any violation, or apparent or threatened violation. Disciplinary action may be taken against an employee or professional staff member if it is discovered that the employee or professional staff member knew or clearly should have known that a potential violation existed but failed to report it.
- Know that violation of one or more of the various laws cited in the corporate compliance policies may result in personal, criminal and civil sanctions and penalties. These laws include the False Claims Act, Civil Monetary Penalties Law, the Stark Law, the Anti-Kickback Statute and the Rhode Island False Claims Act.
- Exercise good faith cooperation in making the Corporate Compliance Program effective.

Summary of Lifespan's Compliance Policies

The following is a brief overview of the various compliance policies grouped together into eight categories. For more information on a specific policy, consult with your manager or review the program manual, which is contained on the Corporate Compliance Program website at <http://intra.lifespan.org/compliance>

Legal Compliance

Lifespan is committed to conducting its actions in conformance with all applicable laws and regulations. Our legal compliance policies cover topics including but not limited to anti-kickback laws, antitrust laws, patient referrals, patient transfers, physician recruitment, non-hiring of sanctioned individuals and certification of need and licensure.

For example, our patient referral policy generally prohibits a physician from referring a patient to an entity in which the physician has a financial interest. In addition, our antitrust policy focuses on a commitment to preserving the free enterprise system by not unreasonably restraining competition.

Billing and Claims

Our compliance policy states that Lifespan will adhere to all federal and state billing, coding and claims regulations. The documenting of services, billing, coding, processing of claims and obtaining reimbursement from Medicare and Medicaid programs are highly regulated and complex. As such, utmost attention to and diligence in these matters is required.

Many Lifespan employees have the responsibility of assigning and entering charges, procedure codes and diagnostic codes; such employees are expected to comply with applicable billing rules to ensure accurate claims are prepared and submitted. False billing is a serious offense and is prohibited; examples of false claims include intentionally and knowingly:

- claiming reimbursement for services not rendered or not medically necessary;
- filing duplicate claims; and
- characterizing the service differently than the service actually rendered.

Additional billing policies relate to professional courtesy, waiver of co-payments and a prohibition against contingency fee coding contracts.

Conflicts of Interest

Lifespan is committed to achieving its mission by conducting its affairs in accordance with the highest professional and ethical standards, including avoiding detrimental conflicts of interest. The conflict of interest policy dictates Lifespan's requirements for implementing a system for disclosure and resolution of conflicts of interest.

Other similar policies in this category include interaction with vendors from the pharmaceutical, medical device and medical supply industries; gifts and entertainment; excess benefits; and private inurement/private benefit. For example, the private inurement/private benefit policy affirms Lifespan's compliance with IRS regulations to ensure that our tax exempt status is maintained.

Confidential Information

Lifespan takes very seriously its responsibility to maintain confidential information. The confidentiality policies relate to patient information, contact with the media and law enforcement, documentation retention, software copyright compliance and the issuance of tax exempt bonds and insider information.

For example, the confidentiality of patient information policy assures that all employees and members of the professional staff comply with our patients' rights to privacy and confidentiality of medical records. This policy is supported by more than 20 additional HIPAA privacy policies, which can also be accessed via the Corporate Compliance Program website. In addition, our computer software copyright policy dictates that personal computer software may not be installed, copied or used on any computer owned by Lifespan or its affiliates, except as permitted by the software licensing agreement.

Positive Work Environment

Providing a positive work environment for all employees is vital to Lifespan's corporate values. The compliance policies intended to promote a positive work environment include, but are not limited to, policies on sanctioned individuals, affirmative action, equal employment opportunity, sexual harassment, substance abuse and occupational safety and health.

For example, the sexual harassment policy states that Lifespan will not tolerate sexual harassment of employees and that swift disciplinary action will occur to eliminate inappropriate conduct. The substance abuse policy dictates that all Lifespan employees will perform their duties at an acceptable performance level — without being impaired by drugs or alcohol.

Political Contributions

All Lifespan employees are encouraged to participate in civic and political activities. Lifespan's direct

political activities are limited by both state and federal laws which mandate that corporations cannot make contributions to candidates for political office. Additionally, Lifespan has created policies governing contracts with major state and municipal decision makers and compliance with lobbying laws and regulations.

Protecting the Environment

Health care settings produce a variety of environmental wastes which are subject to regulatory and accreditation standards. Lifespan and its affiliates practice safe and responsible techniques for handling and disposing of these wastes in compliance with applicable regulations.

Research Activities

All research performed at Lifespan must comply with federal and state laws regulating research activities. For example, Lifespan's scientific integrity policy establishes procedures for resolving and reporting possible misconduct in research related activities. In addition, the grants contract policy affirms Lifespan's intention to obtain grants and contracts from sponsors and to abide by the sponsors' requirements. Further, the research conflict of interest policy describes established mechanisms to identify, analyze, manage and eliminate conflicts of interest that may be detrimental to our patient's safety and the reputation of Lifespan and our research staff.

The Lifespan Corporate Compliance Program Model

The Lifespan Corporate Compliance Program is designed to conform with the United States Federal Sentencing Guidelines. Our program works to ensure that compliance is a continuous activity, involves all Lifespan employees, the board of directors and executive management. The program calls for the development and internal publication of necessary policies, monitors Lifespan activities to anticipate and prevent problems, and ensures that problems, when identified, are appropriately investigated and resolved, including reporting violations to the government when necessary.

The Corporate Compliance Program is fully supported by the office of the president and the board of directors. The board of directors' audit and compliance committee provides guidance to the corporate compliance officer who reports directly to this committee.

The executive corporate compliance committee, composed of various executive managers from each Lifespan partner and the corporate compliance officer, work to develop, implement and maintain the program.

On an ongoing basis the corporate compliance officer and staff members review regulatory publications, conduct special investigations, and complete medical record documentation and billing compliance audits. In addition, the corporate compliance officer oversees general and specific compliance training programs.

In the event a compliance violation is discovered, Lifespan has the proper mechanisms in place to report the violation to the government.

How To Report A Suspected Violation

Every employee, manager and physician is expected to comply with all of the policies and to report any suspected violations. Ignoring a potential violation could significantly jeopardize the high quality of care we offer to the community.

The corporate compliance policies and the code of conduct are meant to guide individuals system-wide. Lifespan's employees, managers and physicians must follow all laws, use sound judgment and consult with their manager or the corporate compliance officer when in doubt.

There are five options for making inquiries about a compliance issue or for reporting a potential compliance violation:

1. Talk to your manager about a compliance issue or concern.
2. Contact your executive corporate compliance committee site representative.
3. Call the 24-hour employee response line at **1-888-678-5111**.
4. Send an e-mail to the corporate compliance officer via the Lifespan intranet.
<http://intra.lifespan.org/compliance/EmailForm.htm>
5. Call the corporate compliance officer directly at **401-444-4728**.

Both the employee response line and the intranet e-mail system established for the Corporate Compliance Program are completely confidential.

Once a compliance offense is detected, the corporate compliance office, along with the executive corporate compliance committee, will investigate the circumstances, take the appropriate steps to prevent a similar offense if it is determined there is a problem, and document the resolution of the issue as appropriate.

Accessing Additional Information on the Program

Extensive information on the code of conduct and the accompanying supporting policies can be found in the Corporate Compliance Program manual on the Lifespan intranet.

All employees are urged to review the code of conduct and the various policies via the intranet.

Your commitment to complying with the program is critical to Lifespan's continued success. If you have any questions or concerns, please consult with your manager or call the corporate compliance office at **401-444-4728**.