



CORPORATE COMPLIANCE MANUAL

To all employees, contractors, vendors, agents, and members of the Board of Directors

The Federal Deficit Reduction Act of 2005 (Section 1902(a)(68) of the Social Security Act mandates that Lifespire® provide to its employees, contractors and agents of the Agency information about its policies which pertain to federal and state false claim acts and whistleblower protections including detecting and preventing fraud waste and abuse. Additional 521 regulations released by OMIG stipulate that vendors and members of the Board also receive this information.

You will find a detailed description of these laws and the whistleblower protections in the pages which follow. Lifespire has also revised the Employee Handbook so that it is in compliance with all applicable laws and regulations. Both documents are available on our website: www.lifespire.org. Simply click on the employee login button on the home page. A complete paper copy of these policies is also available for your review at all Lifespire facilities. A copy of the updated and revised employee handbook was provided to each employee beginning February 1, 2018.

Introduction

The laws and regulations governing the conduct of organizations such as Lifespire, are constantly evolving and are very complex. To ensure that Lifespire provides superior quality of care to the individuals we support, and to ensure that the organization complies with all pertinent laws, rules, and regulations, Lifespire has developed this Corporate Compliance Manual. The Manual establishes our fundamental operating standards. Specific procedures have been developed by each department within the organization, which detail the processes, and systems by which we will ensure that the organization, the Board of Directors, Executive and Management staff, our employees, our independent contractors and vendors conduct themselves appropriately.

Lifespire is dedicated to providing quality care to all individuals served in our multifaceted programs. To this end the Board of Directors, the management staff, clinical staff, and staff providing direct support to people diagnosed with an intellectual disability are committed to the following:

- Responding to the ever-changing needs of the people we support.
- Providing superior care at all day, residential, and clinical program sites;
- Providing an environment that enhances each individual's dignity, security, comfort, and life choices;
- Ensuring that all services are provided by well trained and dedicated staff;
- Operating all programs in a fiscally responsible manner;
- Providing through our staff, our physical plants, and programs, a balance between safety and independence of the people we support, to assist them in achieving their highest level of physical, mental, and psychological wellbeing, in accordance with their individual program plans.

To achieve Lifespire's mission, all employees shall be bound by the following Organizational Standards:

- To serve the needs of the people we support in a dedicated and caring manner;
- To conduct ourselves in a manner that reflects our commitment to integrity, stewardship, excellence, innovation, and growth;
- To effectively manage our human and material resources;
- To value all staff within the organization, and to encourage and support their professional development;
- To adhere to a standard of compliance as embodied in the Agency's Code of Ethics. All employees will conduct business in an ethical manner, and report suspected issues of malfeasance to a supervisor or to the corporate compliance office. Supervisors at all levels will have an "open door policy" with regards to addressing concerns brought to their attention.

Lifespire is committed to conducting its business affairs ethically and in compliance with all applicable laws, rules, and regulations. Lifespire employees, independent

contractors, vendors, agents, and the Board of Directors shall act in accordance with the Agency's Code of Ethics.

The intent of this Manual is to establish the fundamental/core principles by which the organization will operate. Every employee is encouraged to review department specific policies and procedures and to seek the guidance of their supervisor, should questions arise.

The content of all Lifespire department specific policies will be available through the employee extranet on the Lifespire web page.

Lifespire's Compliance Policies and policies relating to the False Claims Act, whistleblower protections and detecting and preventing fraud, waste and abuse are available for viewing by employees and contractors on the Lifespire web site: www.lifespire.org. Employees can also review said policies in the Lifespire Employee Handbook.

The primary goal of the Compliance Manual is to promote a culture of commitment to the prevention, detection, and resolution of situations that may not conform to applicable laws, rules, and regulations, payment requirements, and quality of care standards. The Manual is designed to meet the definition of an "effective program to prevent and detect violations of law."

The Corporate Compliance Manual will be reviewed on a yearly basis, and revisions, based upon both internal (changes to risk) and external (changes to applicable law, rule, and regulations) factors, will occur as necessary.

Lifespire's Compliance Manual shall include the following:

1. Written policies and procedures governing the duties and activities of the Compliance Officer.
2. The Corporate Compliance Work Plan.
3. Code of Ethics
4. Agency Organizational Chart.

These four elements of Lifespire's Corporate Compliance Manual shall provide an overview of how the organization will structure, administer, enforce and otherwise implement the Manual.

Lifespire's Board of Directors has adopted this Compliance Manual, the Code of Conduct, and the Ethics Statement. Every employee and independent contractor will have available to them a copy of this Manual and the Code of Ethics. All Board of Director members, Executive and Management staff, employees, independent contractors, vendors, and volunteers shall be subject to, and shall comply with, the standards set forth in all Corporate Compliance documents.

The Role of the Compliance Officer

The Chief Executive and Board of Directors of the Organization designate Brian Boehm as the Compliance Officer. The Compliance Officer has primary responsibility for Compliance Program development, implementation, monitoring, and evaluation for effectiveness.

The Compliance Officer has direct lines of communication to the Chief Executive, the Board of Directors, the Compliance Committee, and the Organization's legal counsel.

The Compliance Officer's primary responsibilities include:

- Overseeing and monitoring the adoption, implementation, and maintenance of the Compliance Program;
- Developing and implementing Compliance Program policies and procedures and Standards of Conduct (aka the Code of Ethics)
- Reviewing and revising, periodically, the Standards of Conduct, the Compliance Program, and policies and procedures as changes occur within Lifespire, and/or in the law, regulations, or governmental and third-party payers.
- Evaluating the effectiveness of the Compliance Program, policies and procedures, and Standards of Conduct.
- Developing, implementing, and monitoring the annual Compliance Work Plan.
- Reporting, no less frequently than quarterly, to the Board of Directors, Chief Executive, and Compliance Committee on the progress of implementation of the Compliance Program.
- Assisting the Chief Executive, Senior Leadership, Management, and the Compliance Committee in establishing methods to improve the Agency's quality of service and to reduce vulnerability to fraud, abuse, and waste.
- Developing, coordinating, and participating in a multifaceted educational and training program that focuses on the elements of the Compliance Program and seeks to ensure that all Affected Individuals, consistent with roles and any associated risk areas, are knowledgeable of, and comply with, pertinent Federal and State standards and Lifespire's Standards of Conduct.
- Ensuring that excluded individuals and entities are not employed or retained by the Organization.
- Directing internal audits established to monitor effectiveness of compliance standards and the Compliance Program.
- Independently investigating and acting on matters related to compliance, including the flexibility to design and coordinate internal investigations (e.g., responding to reports of problems or suspected violations) and any resulting corrective action with all departments, providers, and sub-providers, agents, and, if appropriate, independent contractors.
- Developing policies and programs that encourage managers and employees to report suspected fraud and other improprieties without fear of retaliation.

- Providing guidance to Management, medical/clinical program personnel, and individual departments regarding policies and procedures and governmental laws, rules, and regulations.
- Maintaining a reporting system, including an anonymous means to report, and responding to concerns, complaints, and questions related to the Compliance Program.
- Overseeing efforts to communicate awareness of the existence and contents of the Compliance Program.
- Ensuring that independent contractors and contractors (recipient service provision, vendors, billing services, etc.) are aware of the requirements of Lifespire's Compliance Program.
- Acting as a resourceful leader regarding regulatory compliance issues. Actively seeking up-to-date material and releases regarding regulatory compliance issues.
- Continuing the momentum of the Compliance Program and the accomplishment of its objectives.