**PURPOSE:**
Health Quest Systems, Inc. and its affiliates ("HQ") are committed to adhere to the highest ethical and legal standards in all of its activities and to, whenever possible and in HQ’s control, ensure that all HQ’s personnel and persons with whom HQ interacts with on a regular basis maintain the same commitments.

**POLICY:**
HQ will not employ, contract with, subcontract with, engage the services of, grant medical staff privileges, or otherwise utilize any Affected Individuals and/or Entities that are or have become an Ineligible Person.

Every Affected Individual and/or Entity will be required to disclose during the hiring or contracting process whether they are an Ineligible Person. HQ is prohibited from making a Commitment with an Affected Individual and/or Entity prior to verifying that the Affected Individuals and/or Entities have not been excluded from any Federal Healthcare Program and have not been convicted of a criminal offense that falls within the scope of 42 U.S.C. Section 1320a-7(a), but has not yet been excluded. Every Affected Individual and/or Entity is required to disclose to HQ immediately if they become an Ineligible Person.

In addition, HQ will not knowingly bill any Federal or State Health Care Program for items or services that are administered, furnished, ordered or prescribed by any Ineligible Person.

**DEFINITIONS:**

**Affected Individuals and/or Entities:** Individuals and entities that provide, prescribe, order or participate in any way in the provision of items or services that are to be reimbursed, directly or indirectly, in whole or in part, by Federal Healthcare Programs. Affected Individuals and/or Entities may include all owners who are natural persons, officers, directors and employees, members of the medical staff, non-medical staff physicians or practitioners, volunteers, vendors, contractors, sub-contractors, agents, or consultants.

**Commitment:** An act by an employee or agent that obligates or appears to obligate HQ to either pay consideration (in cash or in kind) to any third party for goods or services, or provide
<table>
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<tr>
<th>Title:</th>
<th>Government Exclusion from Participation and Ineligible Persons Policy</th>
<th>Reference Number:</th>
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<tbody>
<tr>
<td>Signature:</td>
<td>Chief Compliance Officer</td>
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goods or services to a third party. An example of a Commitment would be making a formal employment offer, signing a contract, issuing a purchase order, etc.

**Ineligible Person:** An individual who, or entity that is, currently excluded from participation in any Federal Healthcare Program or has been convicted of a criminal offense that falls within the scope of 42 U.S.C. § 1320a-7(a), but has not yet been excluded, debarred, suspended or otherwise declared ineligible.

**Federal Healthcare Program:** Any plan or program that provides health benefits, whether directly through insurance, or otherwise, which is funded directly or indirectly, in whole or in part, by the United States Government or a state healthcare program, including without limitation: Medicare, Medicaid, Tricare and Veterans programs.

**REFERENCES:**
HQ 5.1.21 Government Exclusion from Participation and Ineligible Persons Procedure

**POLICY HISTORY:**
Supersedes: 11/14/18
Original implementation date: 2/27/14
Date Reviewed: 11/18/19
Date Revised: 2/27/14, 4/25/18, 9/21/18, 11/14/18, 11/18/19

**APPROVAL:**
Policy Owner: [Signature]
Date: 11/27/19