PURPOSE: To ensure the adequate identification, investigation and reporting of Reportable Events to the OIG, consistent with the requirements of the Health Quest Corporate Integrity Agreement ("CIA"). Capitalized terms in this policy are defined in the CIA.

POLICY:

1. Health Quest will establish and maintain processes to identify, investigate, and report Reportable Events consistent with criteria specified in the CIA.

2. All employees are required to promptly report any known or suspected misconduct, including actual or potential violations of laws, regulations, policies, procedures, Corporate Compliance Plans, or the Code of Conduct and, specifically, in compliance with Health Quest Systems, Inc. ("HQ") policies and procedures:

   - 5.1.05 “Detection and Prevention of Fraud, Waste, and Abuse”
   - COMP 1-1-19 “Whistleblower Protection Policy”
   - 5.1.19 “Identification, Quantification and Repayment of Overpayments”
   - 5.1.21 “Government Exclusion from Participation and Ineligible Persons”
   - 5.1.25 “Compliance Disclosure Program”
   - 5.1.26 “Compliance with Anti-Kickback Statute and Stark Law”

3. If Health Quest determines (after a reasonable opportunity to conduct an appropriate review or investigation of the allegations) through any means that there is a Reportable Event, Health Quest shall notify the OIG within 30 days of the making the determination that the Reportable Event exists.

4. Reports of Reportable Events will be made pursuant to the requirements of the CIA.

DEFINITIONS:
Reportable Event: A “Reportable Event” means anything that involves:

1. A substantial Overpayment (See HQ Policy and Procedure 5.1.19 “Identification, Quantification and Repayment of Overpayments”);

2. A matter that a reasonable person would consider a probable violation of criminal, civil, or administrative laws applicable to any Federal health care program for which penalties or exclusion may be authorized;

3. The employment of or contracting with a Covered Person who is an Ineligible Person (See HQ Policy and Procedure 5.1.21 “Government Exclusion from Participation and Ineligible Persons”);

4. The filing of a bankruptcy petition by Health Quest.

REFERENCES:
- 5.1.05 “Detection and Prevention of Fraud, Waste, and Abuse”
- COMP 1-1-15 “Whistleblower Protection Policy”
- 5.1.19 “Identification, Quantification and Repayment of Overpayments” “Government Exclusion from Participation and Ineligible Persons”
- 5.1.21 “Government Exclusion from Participation and Ineligible Persons”
- 5.1.25 “Compliance Disclosure Program”
- 5.1.26 “Compliance with Anti-Kickback Statute and Stark Law”
- Health Quest Corporate Integrity Agreement dated June 29, 2018

ENFORCEMENT:
All individuals whose responsibilities are affected by this process are expected to be familiar with the basic procedures and responsibilities created by this process. Failure to comply with this process will be subject to appropriate remedial and/or disciplinary action, up to and including termination of any employment or other relationship, in accordance with this process.
<table>
<thead>
<tr>
<th>Title:</th>
<th>Reportable Events Policy</th>
<th>Reference Number:</th>
<th>HQ 5.1.04</th>
</tr>
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<tbody>
<tr>
<td>Signature:</td>
<td>Chief Compliance Officer</td>
<td>Page #:</td>
<td>Page 3 of 3</td>
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</tbody>
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**POLICY HISTORY:**
Supersedes: 1/9/2019  
Original Implementation Date: 1/9/2019  
Date Reviewed: 1/6/2020  
Date Revised: 1/9/2019, 1/6/2020

**APPROVAL:**

Policy Owner: [Signature]  
Date: 1/24/20