PURPOSE:
The purpose of this policy is to require that certain senior management individuals (“Certifying Employees”) and certain direct/indirect reports of theirs (“Sub Certifier”) routinely certify, in writing, compliance with applicable federal and state requirements and obligations of Health Quest’s Corporate Integrity Agreement (“CIA”).

POLICY:
Each Certifying Employee shall: complete appropriate training on, and maintain an understanding of, applicable federal or state laws and regulations, the Health Quest Systems Inc., and its affiliates’ (“HQ”) Code of Conduct, compliance policies and procedures, and obligations of the CIA within their scope of responsibility; monitor, oversee and promote compliance with the respective requirements; report any potential violations of respective requirements to the Compliance Officer; make Routine Management Certification, in writing, to Health Quest of compliance with these requirements; and make certification, in writing, of compliance with these requirements with the understanding that the annual certification is being relied upon by the United States.

DEFINITIONS:
Certifying Employee: The President/Chief Executive Officer (“CEO”), Chief Compliance Officer (“CCO”), Chief Medical Operations Officer (“CMOO”), Chief Financial Officer (“CFO”), Chief Risk Officer (“CRO”), Chief Operations Officer (“COO”), Chief Information Officer (“CIO”), Chief Human Resources Officer (“CHRO”), Chief Strategy Officer (“CSO”), and Chief Experience Officer (“CXO”)

Sub Certifier: Certain management positions held by an individual responsible for directing day-to-day operations that reports directly or indirectly to a Certifying Employee.

Routine Management Certification: A written certification of compliance, within a scope of responsibility, that is routinely made by a Certifying Employee to Health Quest on a schedule established by the Compliance Department and reported to the Executive Compliance Committee (“ECC”).
Routine Management Sub-Certifications:  A written certification of compliance, within a scope of responsibility, that is routinely made by a Sub Certifier to a Certifying Employee on a schedule established by the Compliance Department and reported to the ECC.

Annual Management Certification: A written certification of compliance, within a scope of responsibility, that is annually made by a Certifying Employee to Health Quest and to the U.S. Department of Health and Human Services Office of Inspector General (“HHS OIG”).

POLICY STATEMENT:

A. Certifying Employees and Sub Certifiers are expected to be trained and understand compliance, to take steps to assure and promote compliance, to report compliance concerns or potential non-compliance to the CCO and to monitor and oversee activities for compliance within their scope of responsibility on an ongoing basis.

B. Certifying Employees and Sub Certifiers must ensure that statements contained in the Routine/Annual Management Certifications and Routine Management Sub-Certifications accurately reflect the activities in their areas of responsibility.

C. The CCO shall implement and maintain, with the ECC’s concurrence, a process that:
   a. Meets the Certification requirements of the CIA.
   b. Supports routine submission of Routine Management Sub-Certifications and Routine/Annual Management Certifications by Sub Certifiers and Certifying Employees.

D. Sub Certifiers shall submit Routine Management Sub-Certifications to the Compliance Department in the format and due date established by the Compliance Department.

E. Certifying Employees shall submit Routine/Annual Management Certifications to the Compliance Department in the format and due date established by the Compliance Department. In the event of a vacancy in a Certifying Employee position, an individual will be assigned to complete the requirements of this policy and the CIA.

F. The CEO, CCO and CFO and other Certifying Employees shall make such other written certifications to the HHS OIG as required by the CIA.

G. The CCO shall:
   a. Provide quarterly or more frequent reports to the ECC summarizing the results of the Routine/Annual Management Sub-Certifications and Management Certifications.
b. Submit all Certifications to the HHS OIG, as required by the CIA.

**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 result in appropriate remedial and/or disciplinary action, up to and including termination of any employment or other relationship, in accordance with this process.

**DOCUMENT RETENTION:**
HQ will retain all documents relating to this process for a period of seven years after their creation.

**REFERENCES:**
United States Sentencing Commission, Guidelines Manual, Ch. 8 (Nov. 2015).
HQ 5.1.24 Management Certification Procedure

**POLICY HISTORY:**
Supersedes: 3/13/19
Original Implementation Date: 4/25/18
Date Reviewed: 3/13/20
Date Revised: 4/25/18, 3/13/19, 3/13/20

**APPROVAL:**

W.A. McNulty by [Signature]
Policy Owner

3.31.20
Date