



Policy Executive Summary & Primer

Policy Title and Number:	<i>Federal Anti-Kickback Statute</i>	CORE-LC-002.2
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This executive summary document is intended only to provide an overview of the information contained within the policy. In no way does this document replace or supersede the content of the policy.

Executive Summary

- The Federal Anti-Kickback Statute Policy (“Policy”) provides guidance for compliance with the Federal Anti-Kickback Statute and provides information to help prevent fraud, waste, and abuse within the Company.
- This policy describes the Anti-Kickback Statute, which prohibits the knowing and willful offer, solicitation, payment, or receipt of anything of value that is intended to:
 - induce the referral of an individual for which payment may be made by Federal or State health care programs; or
 - induce the order, purchase, lease, or arrangement for any service or item paid for by Federal or State health care programs; or
 - induce recommending the purchase, lease, or ordering of any service or item paid for by Federal or State health care programs.

Key Policy Requirements

- Employees must adhere to all federal and state fraud and abuse laws and regulations.
- Remuneration paid to or received from any potential referral source must not be a payment for referrals.
- If even one purpose of the remuneration offered, paid, received, etc. is in exchange for referrals or to induce referrals, it is illegal.
- Both parties that participate in an impermissible “kickback” transaction can be found guilty of committing a felony crime.
- Transactions, arrangements, and relationships must fit within the statutory and regulatory safe harbors set forth in the AKS.
- The Compliance Officer (“CO”) and Legal Department must review all agreements with joint venture partners, physicians, service providers, independent contractors, vendors, manufacturers and suppliers before such agreements are executed.
- AKS violations should immediately be reported to the Compliance Officer (directly or through the Company’s compliance hotline) or the Company’s Legal Department.
- The CO must investigate any and all reported violations in a timely manner.
- The CO will take necessary actions to prevent reoccurrence of violations.