

Hill-Rom® Third Party Payer Compliance and Integrity Program

Program Summary Document

The mission of Hill-Rom is to make a positive difference in the lives of patients and caregivers. In fulfilling this mission, Hill-Rom is dedicated to adhering to the highest ethical standards and applicable laws and regulations. As evidence of this dedication, the Executive Management Team has endorsed the Hill-Rom Third Party Payer Compliance and Integrity Program (Program).

1. **Responsibility**: The Hill-Rom Executive Management Team has ultimate responsibility for oversight of the Hill-Rom Third Party Payer Compliance and Integrity Program. However, the Compliance Officer is responsible for the day – to – day operation and oversight of the Program.
2. **Compliance Officer**: The Compliance Manager within the Regulatory and Compliance Department is designated as the Compliance Officer.
3. **Scope**: The Third Party Payer Compliance and Integrity Program includes policies and processes related to the placement and subsequent billing of Hill-Rom products to third party payers.
4. **Primary purposes** of the Hill-Rom Third Party Payer Compliance and Integrity Program Manual are:
 - 4.1. Provide the foundation for the Program by documenting Hill-Rom's compliance with the following basic elements of an effective compliance program:
 - 4.1.1. Implementing written policies, procedures and standards of conduct;
 - 4.1.2. Designating a compliance officer and compliance committee;
 - 4.1.3. Conducting effective training and education;
 - 4.1.4. Developing effective lines of communication;
 - 4.1.5. Enforcing standards through well-publicized disciplinary guidelines;
 - 4.1.6. Conducting internal monitoring and auditing;
 - 4.1.7. Responding promptly to detected offenses and developing corrective action.
 - 4.2. Provide an authoritative resource to Hill-Rom Associates/Agents involved in any activity directly or indirectly related to a third party or other government payer.
5. **Foundational tenets** of the Program:
 - 5.1. The Program is a part of the fabric of the organization's routine operations. The structure and implementation of the Program will:
 - 5.1.1. Assess the organization's business activities and consequent legal risks;
 - 5.1.2. Educate Associates/Agents regarding compliance requirements;
 - 5.1.3. Train Associates/Agents to conduct their job activities in compliance with all state and federal laws and Hill-Rom policies and procedures;

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- 5.1.4. Implement and maintain monitoring and reporting functions to test the effectiveness of the Program and detect misconduct or noncompliance;
- 5.1.5. Incorporate enforcement and corrective action components to ensure that all Associates/Agents take their compliance responsibilities seriously;
- 5.1.6. Maintain appropriate lines of communication for reporting of compliance violations and concerns or obtaining clarification/answers to compliance questions;
- 5.1.7. Maintain appropriate oversight of Program operations.
- 5.2. No Associate/Agent has the authority to act contrary to any provision of the Program or approve, tolerate, or encourage any such misconduct or noncompliance by others.
- 5.3. Any Associate/Agent with knowledge of information concerning a suspected violation of law or a violation of the Program is required to report the suspected violation in accordance with the Reporting policy.
- 5.4. Associates/Agents who violate any provision of the Program, including the duty to report suspected violations, shall be subject to corrective action.
- 5.5. Associates/Agents who have questions or uncertainties regarding compliance with applicable state or federal law, or any aspect of the Program, should seek immediate clarification from their supervisor or the Compliance Officer.
6. **Applicability**: The Hill-Rom Third Party Payer Compliance and Integrity Program is applicable to all Associates/Agents involved with the sale, placement and/or subsequent third party billing of our products or who are directly or indirectly involved with the third party payer business.
7. **Program training and review requirements**: As part of the initial and ongoing employment or contractual/work relationship, all applicable Associates/Agents will be responsible to complete required Program training and certification in accordance with the Compliance Training and Certification Plan.
8. **Interactions with Health Care Professionals**: Hill-Rom has adopted guidelines and practices relative to interactions with healthcare professionals, including applicable limits on gifts to health care professionals.
9. **Compliance Hotline**: Questions about this Program Summary Document or the Hill-Rom Third Party Payer Compliance and Integrity Program may be addressed through the Compliance Hotline at 1-888-266-2577.
10. **Code of Ethics and Compliance with Program and Applicable Laws**: It is Hill-Rom's policy to conduct its business and operations according to the standards and guidelines of ethical business conduct stated in the company's Code of Ethical Business Conduct, the Program and all applicable laws and regulations, including applicable provisions of the California Health and Safety Code.