

**EPIC MANAGEMENT, L.P.  
BEAVER MEDICAL GROUP, L.P.  
EPIC HEALTH PLAN**

**ADMINISTRATIVE POLICY AND PROCEDURE  
COMPLIANCE**

<b>SUBJECT:</b> Compliance Program Definitions	
<b>DRAFTED BY:</b> Sherry Miller, CCO	<b>DATE:</b> 8/17/2020
<b>REVIEWED BY:</b>	<b>DATE:</b>
<b>REVISED BY:</b>	<b>DATE:</b>
<b>APPROVED BY:</b> Compliance Committee	<b>DATE:</b> 8/17/2020
<b>BOARD APPROVAL DATE:</b> N/A	
<b>EFFECTIVE DATE OF POLICY:</b> 9/1/2020	

1. **PURPOSE:** This EPIC Compliance Program Definitions Policy sets forth and defines key terms that are used throughout EPIC’s Compliance Program Policies.
2. **ATTACHMENTS:** N/A.
3. **POLICY:**
  - a. **Definitions.** In all of EPIC’s Compliance Program Policies, the following capitalized terms shall have the following meanings:
    - i. “Advanced Practice Practitioner” refers to a physician assistant or nurse practitioner.
    - ii. “BMG” refers to Beaver Medical Group, L.P.
    - iii. “Board” refers collectively to the Boards of Directors of EPIC Health Plan, EPIC Management, Inc., and The Beaver Medical Clinic, Incorporated.
    - iv. “CMS” means the Centers for Medicare & Medicaid Services, the agency within the U.S. Department of Health & Human Services responsible for oversight of the Medicare Advantage program.

- v. “Corporate Integrity Agreement” or “CIA” refers to the corporate integrity agreement entered into by EPIC and HHS-OIG, effective December 27, 2019.
- vi. “Compliance Concern” refers to any suspected misconduct, compliance irregularities, or any other activity, practice, or arrangement that any Personnel member believes in good faith violates or may violate applicable laws or regulations, Federal Health Care Program requirements, EPIC Compliance Program Policies, or the EPIC Code of Conduct.
- vii. “Compliance Hotline” refers to EPIC’s compliance telephone line, as described in the EPIC Duty to Report Compliance Concerns Policy.
- viii. “Compliance Program” refers to the joint compliance program of the EPIC entities.
- ix. “Compliance Program Policies” refers to EPIC’s written policies and procedures regarding the operation of its Compliance Program, including EPIC’s compliance with Federal Health Care Program requirements, applicable law, and any corporate integrity agreement entered into with HHS-OIG.
- x. “EPIC” refers collectively to Beaver Medical Group, L.P., EPIC Health Plan, EPIC Management L.P., EPIIC Management, Inc., and The Beaver Medical Clinic, Incorporated.
- xi. “EPIC Management” refers to EPIC Management, L.P.
- xii. “EHP” refers to EPIC Health Plan.
- xiii. “Federal Health Care Program” is defined at 42 U.S.C. § 1320a-7b(f) and includes Medicare, Medicaid, TRICARE, and certain other government funded health care programs and plans.
- xiv. “Health Care Counsel” refers to outside legal counsel designated by EPIC as its lead legal counsel with respect to health care regulatory and compliance matters.
- xv. “HHS-OIG” refers to the U.S. Department of Health and Human Services, Office of Inspector General.
- xvi. “Ineligible Person” includes any individual or entity that (1) is excluded from participation in any Federal Health Care

Program; or (2) 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.

- xvii. “Personnel” refers to all EPIC owners, officers, directors, and employees, as well as all contractors, subcontractors, agents, and other persons who, on behalf of an EPIC entity (a) furnish patient care items or services, or (b) perform billing, coding, or Risk Adjustment Data Functions. This term does not include vendors whose sole connection with EPIC is selling or otherwise providing medical supplies or equipment to EPIC..
  - xviii. “Risk Adjustment Data Functions” include activities such as obtaining or developing or maintaining protocols or systems to obtain risk adjustment data (as defined at 42 C.F. R. § 422.310) from providers or submitting or developing or maintaining protocols or systems to submit risk adjustment data to Medicare Advantage organizations or their contractors.
  - xix. “Training Plan” refers to the written compliance training and education plan described in the EPIC Compliance Training and Education Policy.
- b. Repetition of Definitions for Clarity. Some of the above definitions may be repeated in certain Compliance Program Policies for ease of reference and clarity.
  - c. Additional Defined Terms. Certain Compliance Program Policies may contain additional defined terms that are specific to that Policy.