

**Barrington Lakes Group, Inc.
Customized Corporate Compliance Program
Key Elements**

A. Licensed Material:

All material will be customized specifically for Client for each site of service

1. **Customized Compliance Manual** – Licensed for each Location
2. **Customized Compliance Officers Manual** – Licensed for each Location
3. **Customized Code of Conduct** – Adopted by Management, Signed by each Employee
4. **Board of Directors Resolution** – Delegates Responsibility to Implement and Maintain a Compliance Program
5. **Corporate Resolutions**
6. **Compliance Officer Designation Letter**
7. **Compliance Committee Designation Letter**

B. Customized Compliance Training Program – Two Hours of Training

- **Training Module I**
- **Training Module II**

C. Additional Provided Material:

1. Business Associates Agreement (model)
2. Social Security Act Compliance (Reference)
3. Compliance Program Implementation Schedule - Customized

Contact us today for more information:

847-526-5886

Email: dsmith@barringtonlakes.com



COMPLIANCE PROGRAM
ILLUSTRATIONS

- 1. Corporate Compliance Program - Table of Contents**
- 2. Compliance Officer's Manual - Table of Contents**
- 3. Code of Conduct Illustration**

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Compliance Manual

Table Of Contents

- I. COMPLIANCE PROGRAM AND THE COMPLIANCE MANUAL
 - II. COMPLIANCE OFFICER AND THE COMPLIANCE COMMITTEE
 - III. EMPLOYEE TRAINING/EDUCATION POLICY
 - IV. PREVENTING AND DETECTING AREAS OF REGULATORY CONCERN WHICH HAVE BEEN IDENTIFIED AS AREAS OF POTENTIAL SIGNIFICANT RISK OF LEGAL VIOLATIONS
 - V. RELATIONSHIPS WITH BUSINESS ENTITIES OR INDIVIDUALS
 - VI. AUDITING POLICY
 - VII. DISCLOSURE/REPORTING POLICY
 - VIII. RECORD RETENTION POLICY
 - IX. ENFORCEMENT AND PREVENTION POLICY
 - X. DISCIPLINE POLICY
 - XI. EMPLOYEE PERFORMANCE EVALUATIONS
 - XII. PROCEDURE IN THE EVENT OF AN INVESTIGATION OR SEARCH CONDUCTED BY A FEDERAL OR STATE GOVERNMENT AGENCY
- APPENDIX A: Goals of the Compliance Program
- APPENDIX B: Areas of Potential Significant Risk of Legal Violations
- APPENDIX C: Contact Numbers
- APPENDIX D: Voluntary Disclosure Procedure

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Compliance Officers Manual

Table of Contents

FILE LOG

A. Areas of Potential Significant Risk.....	<i>File Fraud alerts and Medicare bulletins</i>
B. Compliance Program Review.....	<i>File Form A</i>
C. Training Section	<i>File Forms B, C, D and Records of Attendance or Proof of Outside Training (i.e. copies of certificates, etc)</i>
D. Zero Tolerance Policy	<i>File Form E</i>
E. Screening	<i>File Forms, F, G, H, I</i>
F. Audit Logs	<i>File Forms J, K</i>
G. Disclosure/Reporting	<i>File Forms L, M, N, O</i>
H. Reports of Possible Violations.....	<i>File Founded Reports, Unfounded Reports and Reports under investigation</i>
I. Discipline Records.....	<i>File Discipline for Insufficient Training and Discipline taken pursuant to "Enforcement and Prevention" Policy</i>
J. Copies of Old Policies Since Amended.....	<i>File Policies</i>
K. Letters to Excluded Physicians, Individuals and Businesses...	<i>File Form P</i>
L. Exclusion Lists.....	<i>File Lists of Excluded Providers</i>

Attached Forms Include:

Form A	Compliance Program Review Signature List
Form B	Training/Education Documentation of Individual Employees
Form C	Training/Education Documentation of Training Programs Offered
Form D	Training Program Sign In Sheet for Individual Programs
Form E	Zero Tolerance Policy
Form F	Screening: To be Completed by Prospective Employee
Form G	Screening: Non-Employees (Business Entities and Individuals)
Form H	Attestation of Formerly Excluded Business Entity/Individual of Eligibility for Medicare/Medicaid Participation
Form I	Screening Form for Employees and Non-Employees [To be completed by Corporation when forms G & H are distributed]
Form J	Employee Auditing Form
Form K	Audit Report for New Employees
Form L	Simple Error Log Form
Form M	Confidential Incident Report Form
Form N	Compliance Officer's Quarterly/Annual Report to Board of Directors
Form O	Confidentiality Agreement of Reporter
Form P	Exclusion Letters

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BARRINGTON LAKES GROUP

CORPORATE COMPLIANCE PROGRAM

CODE OF CONDUCT

SAMPLE – FOR ILLUSTRATION ONLY

Date: _____

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4 Whitetail Trail Suite 100 Barrington, Illinois 60010
Phone: 847.526.5886 Fax: 847.526.5887 Email: dsmith@barringtonlakes.com

CODE OF CONDUCT

Purpose

This Code of Conduct has been adopted by NAME OF ENTITY Board of Directors to provide standards by which employees and physicians of NAME OF ENTITY will conduct themselves in order to protect and promote organization-wide integrity and to enhance NAME OF ENTITY ability to achieve the organization's mission.

Introduction

The Code of Conduct contains Principles articulating the policy of the organization and Standards which are intended to provide additional guidance to persons functioning in managerial or responsible capacities. The Principles set forth in this Code of Conduct shall be distributed periodically to all employees. The Principles and Standards shall be distributed annually to directors, officers, selected employees and physicians and agents having administrative or managerial responsibilities. All personnel are responsible to ensure that their behavior and activity is consistent with the Code of Conduct.

As used in this Code of Conduct, the term "Practice" means NAME OF ENTITY and each of its divisions, subsidiaries and operating or business units. The term "agents" means services organizations contracted by Practice to perform certain duties and responsibilities on behalf of Practice in normal practice operations. The terms "officer", "director", "employee", "physician" include any person who fills such a role or provides services on behalf of Practice or any of its divisions, subsidiaries, or operating or business units.

SAMPLE – FOR ILLUSTRATION ONLY

Principle 1 – Legal Compliance

Practice will strive to ensure all activity by or on behalf of the organization is in compliance with applicable laws.

The following standards are intended to provide guidance to employees, physicians and persons in managerial or administrative positions to assist them in their obligation to comply with applicable laws. These standards are neither exclusive nor complete. Employees are required to comply with all applicable laws, whether or not specifically addressed in these policies. If questions regarding the existence of, interpretation or application of any law arise, they should be directed to NAME OF ENTITY counsel.

Principle 2 – Business Ethics

In furtherance of NAME OF ENTITY commitment to the highest standards of business ethics and integrity, employees, physicians and agents will accurately and honestly represent NAME OF ENTITY and will not engage in any activity or scheme intended to defraud anyone of money, property or honest services.

The Standards set forth below are designed to provide guidance to ensure that NAME OF ENTITY business activities reflect the high standards of business ethics and integrity. Employee and physician conduct not specifically addressed by these standards must be consistent with Principle 2.

Principle 3 – Confidentiality

NAME OF ENTITY shall strive to maintain the confidentiality of patient and other confidential information in accordance with applicable legal and ethical standards.

NAME OF ENTITY and its employees, physicians and agents are in possession of and have access to a broad variety of confidential, sensitive and proprietary information, the inappropriate release of which could be injurious to individuals, Practice business partners and Practice itself. Every NAME OF ENTITY employee, physician and agent has an obligation to actively protect and safeguard confidential, sensitive and proprietary information in a manner designed to prevent the unauthorized disclosure of information.

SAMPLE – FOR ILLUSTRATION ONLY

Principle 4 – Conflicts of Interest

Directors, officers, committee members and key employees owe a duty of undivided and unqualified loyalty to the organization. Persons holding such positions may not use their positions to profit personally or to assist others in profiting in any way at the expense of the organization. (Please refer to NAME OF ENTITY Conflict of Interest Policy for further guidance.)

All covered persons are expected to regulate their activities so as to avoid actual impropriety and/or the appearance of impropriety which might arise from the influence of those activities on business decisions of NAME OF ENTITY, or from disclosure or private use of business affairs or plans of NAME OF ENTITY

Principle 5 – Business Relationships

Business Transactions with vendors, contractors and other third parties shall be transacted free from offers or solicitation of gifts and favors or other improper inducements in exchange for influence or assistance in a transaction.

The Standards set forth below are intended to guide key employees and physicians in determining the appropriateness of the listed activities or behaviors within the context of Practice business relationships, including relationships with vendors, providers, contractors, third party payors and government entities. It is the intent of Practice that this policy be construed broadly to avoid even the appearance of improper activity. If there is any doubt or concern about whether specific conduct or activities are ethical or **otherwise appropriate, you should contact NAME OF ENTITY counsel.**

Principle 6 – Protection of Assets

All employees, physicians and agents will strive to preserve the Practice assets by making prudent and effective use of Practice resources and properly and accurately reporting its financial condition.

The Standards set forth below are intended to guide key employees, physicians and agents by articulating NAME OF ENTITY expectations as they relate to activities or behaviors which may impact Practice's financial health or which reflect a reasonable and appropriate use of the assets of the entity.

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Administration and Application of this Code of Conduct

NAME OF ENTITY expects each person to whom this Code of Conduct applies, to abide by the Principles and Standards set forth herein and to conduct the business and affairs of NAME OF ENTITY in a manner consistent with the general statement of principles set forth.

Failure to abide by this Code of Conduct or the guidelines for behavior which the Code of Conduct represents may lead to disciplinary action. For alleged violations of the Code of Conduct, NAME OF ENTITY will weigh relevant facts and circumstances, including, but not limited to, the extent to which the behavior was contrary to the express language or general intent of the Code of Conduct, the egregiousness of the behavior, the employee's, physician's or agent's history with the organization and other factors which Practice deems relevant. Discipline for failure to abide by the Code of Conduct may, in Practice's discretion, range from oral correction to termination. In the event that an employee, physician or agent is covered by the terms of a collective bargaining agreement, discipline shall be in accordance with the provisions of the collective bargaining agreement.

Nothing in this Code of Conduct is intended to nor shall be construed as providing any additional employment or contract rights to employees or other persons.

While NAME OF ENTITY will generally attempt to communicate changes concurrent with or prior to the implementation of such changes, NAME OF ENTITY reserves the right to modify, amend or alter the Code of Conduct without notice to any person or employee.

Accepted:

Date: _____

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