

SELFHHELP COMMUNITY SERVICES, INC.		Policy #: 21
CORPORATE COMPLIANCE POLICY AND PROCEDURE MANUAL		Page 1 of 2
Subject: Vendors and Suppliers	Effective Date January 2006	Revision Date 02/2008, 1/2014, 3/2018, 8/2023
Section: Corporate Compliance General		

POLICY:

Selfhelp relies on its vendors and suppliers to assist in providing care and services to its clients, and prohibits payment to the organization of any remuneration, cash or kind, in exchange for referrals to the vendor or supplier.

Neither Selfhelp nor a vendor shall solicit or receive from any person or entity, nor offer to give to any person or entity, anything of value if that person or entity is in a position to refer business to that person or entity, except as permitted by law.

PROCEDURE:

1. Selfhelp will not enter into any contract or business arrangement with a vendor or supplier who has been excluded from Federal health care programs.
2. Arrangements with vendors and suppliers are structured through contractual agreements so that pricing and arrangement of items or services are aligned with industry standards.
3. All vendor and supplier agreements shall meet the requirements listed below when any item(s) or services(s) supplied by the vendor are reimbursable under any state or federal health care program. This list is not exhaustive and will be reviewed annually for additions. The vendor and supplier agreements:
 - A) Shall be in writing and shall specify the particular services or supplies to be provided;
 - B) Shall specify the responsibilities of each party in relation to the provision of services;
 - C) Shall specify the fee or payment to be made to the vendor, which shall be set at the fair market value for such services or supplies and/or be based upon applicable fee schedules or other payment guidelines established by the

Centers for Medicare and Medicaid Services or its designees, the state Medicaid agency or its designees, or other applicable third party payers,

- D) Shall not indicate volume of services to be provided to or by Selfhelp as appropriate;
 - E) Shall specify the billing requirements and payment method;
 - F) Shall indicate the required insurance coverage of the contractor; and
 - G) Shall be signed by all parties.
4. When appropriate, the vendor shall certify current eligibility for participation in the Medicare and Medicaid programs. This does not preclude Selfhelp from doing its search into excluded entities and persons database at its discretion.
 5. The vendor or supplier will cooperate with Selfhelp in the event that any third-party payer or auditing entity, including the Medicaid program and the Community Health Accreditation Program (CHAP), conducts an audit or otherwise requests documentation regarding services or supplies provided by the vendor or supplier.
 6. The vendor or supplier must notify the Selfhelp Legal Department or Compliance Officer of any remedies or sanctions, including termination or participation in Medicare, or the state Medicaid program, imposed by CMS, the OIG or any state Medicaid agency or the initiation of any audit or investigation of the vendor or supplier by any such agency. Such sanctions and/or termination of participation in Medicare and/or Medicaid may result in termination of the existing agreement.
 7. Vendors and suppliers may not subcontract any service that it cannot provide directly to Selfhelp.
 8. All subcontracts shall provide that contractors are subject to the *Corporate Compliance Program and Code of Conduct & Ethical Behavior*, to the extent that such contractors are affected by Selfhelp's risk areas and only within the scope of the contracted authority and affected risk areas.
 9. Subcontracts shall include disciplinary standards and related procedures, if applicable, including termination provisions for failure to adhere to the *Corporate Compliance Program and Code of Conduct & Ethical Behavior*.
 10. Signed agreements will be kept on file by the Legal Department.