



Introduction to the

Select Medical Compliance Program



**SELECT MEDICAL
COMPLIANCE**

Select Medical, its subsidiaries, affiliates and joint venture entities controlled by Select Medical



Message from the CEO

Dear Select Medical Colleague

At Select Medical, we believe acting ethically and responsibly is not only the right thing to do, it is essential to providing an exceptional patient care and employee experience. Compliance is deeply rooted into our organizational culture. It is about creating a workplace where colleagues can thrive and excel and in turn where our patients and their families receive the best care possible.

Select Medical is focused on collaboration, excellence and results. We strive every day to achieve our Four Key Results:

- Deliver an exceptional patient experience
- Keep our patients and each other safe
- Deliver an exceptional employee experience
- Meet the annual business plan

To achieve these results, we need to make certain cultural commitments. It's the Select Medical Way of doing business: **Doing the right thing is part of a healthy corporate culture.**

David S. Chernow
President & Chief Executive Officer

What is Compliance?

As David Chernow said in his message, “**Doing the right thing is part of a healthy corporate culture.**”

With over 50,000 employees treating nearly 80,000 patients each day, we have an extraordinary impact on our communities. We treat patients battling life threatening illnesses and recovering from debilitating injuries. Knowing your job and doing it well is driven by good decisions.

Compliance at Select Medical is straightforward:



Do the Right Thing

This refers to the policies & procedures and the rules and regulations that define how we treat and bill for care. Do the right thing starts with knowing and then following those policies and procedures that define your job.



The Right Way

This is how we treat each other and our patients. One of our core values is we strive to treat others as THEY want to be treated. In our experience, there are fewer compliance issues when we treat each other with respect. How you treat your patient defines our entire organization to that person.



Each and Every Time

Consistency. Often, this is the most difficult part of the motto. Our goal is to follow policy and procedure each and every time. Our goal is to treat each other with respect and empathy each and every time. And, our commitment is to consistently do all of this, especially when it is most difficult, because we know it makes all the difference.



When it comes to compliance, your daily actions and beliefs, directly affect the quality of the decisions around you. That is why we believe doing the right thing thrives in a healthy culture.

Compliance isn't a lack of issues. Compliance is all of us working to do the right thing and having discussions about concerns. A strong culture that focuses on the employee & patient experience means that issues and concerns are addressed early before they become large issues requiring a hotline call.

The overall employee & patient experience relies heavily on the daily decisions we make. Remaining committed to a strong ethical foundation creates a safe environment for our patients, for ourselves, and for all those whose lives we touch.

Compliance Thrives in a Healthy Culture

We know that compliance thrives in a healthy culture. The culture is driven by knowing your job and doing it great, and by feeling safe enough that when something goes wrong, or you are unsure how to proceed, you can raise a concern with a leader.

Elements of a Compliance Program

Select Medical has a comprehensive Compliance Program that was established in 1998 based on the Office of Inspector General's guidelines for an effective Compliance Program. Our program consists of the following:



Compliance Officer

Bob Breighner is our Compliance Officer and is responsible for overseeing and monitoring all elements of the Compliance Program for all of Select Medical. Bob joined Select Medical as Director, Internal Audit in 2001 and has managed the overall compliance function since 2003. These two departments work together to communicate about, educate on and monitor regulatory risk. He also has direct access to the Board of Directors' Audit and Compliance Committee.

Compliance and Audit Committee



The committee consists of members of senior management and meets quarterly to oversee and monitor the Compliance Program.

Response to Detected Deficiencies



All confirmed issues require a corrective action plan, which include necessary paybacks, disciplinary action & education and training.

Code of Conduct/Policies and Procedures



This foundational document provides guidance to ensure our work is done in an ethical and legal manner. It emphasizes the shared common values and culture, which guide our actions. The Code of Conduct is available on our Intranet, Internet and learning management system (Select University).

Compliance/Ethics Hotline



Our reporting hotline is accessible to all employees, patients, and vendors to report compliance concerns and Code of Conduct violations. Callers have the option to withhold their name and report anonymously. Every report is investigated and addressed in a timely basis and appropriate action plans are developed to address confirmed issues.

The hotline is operated by a third party and all reports are provided to the compliance officer. The company has a "non-retribution" policy, which means no retaliatory actions may be taken against any caller for reporting violations in good faith.

Education and Communication



Select Medical completes annual targeted training and education for all employees based on job function. In addition, compliance staff visit sites to provide education and information. We also provide communications to employees regarding current compliance issues through monthly e-mails.

Auditing and Monitoring



Select Medical has an Internal Audit function that was established in 2001. The audit work plan includes Sarbanes Oxley / Operational, Compliance, and Clinical Compliance audits which review key risk areas.

Enforcement of Disciplinary Standards



Our employee handbook defines our progressive discipline procedures. There is a collaborative review and decisions are made with Operations, Human Resources, Legal, and Compliance on disciplinary matters.

Employee Responsibilities: Your Role



Know the Code of Conduct

At hire, login to Select University and access, read and acknowledge the Code of Conduct. We distribute this document electronically and the most recent version is always available in Select University or on the Select Medical intranet site and the Select Medical internet site.

Complete on Board Training

At hire, while in Select University, complete your Annual Compliance Training (ACT). These trainings orient you to policies, procedures and expectations.



Complete Training Annually

Annually, all employees are reassigned the ACT Series. You will be notified when the training is assigned to you in Select University each year.

Know Your Job

Learn your operational policies and procedures and follow them, each and every time.



Communicate Concerns

Finally, if you encounter any situations that cause you concern, please report them to your leadership or the Compliance Department. Reporting resources appear at the end of this document as well as on the Select Medical intranet.

Health Insurance Portability and Accountability Act (HIPAA)

One of Select Medical's Key Results is: Keep Our Patients and Each Other Safe. This is how we view our compliance with the HIPAA policies and procedures. The information we possess about our patients is important and sensitive. It is our responsibility to protect this information from those who could misuse it to harm or exploit our patients.



Bob Breighner is the Privacy Officer for Select Medical's HIPAA initiatives. As the Privacy Officer, Bob reviews HIPAA policies and procedures annually and the Privacy Team reports to him.



To access policies and procedures and information related to HIPAA, navigate to the HUB. In the search field type "Index of HIPAA." The available resources include:

- 🔍 Division Specific Fax Cover Sheet
- 🔍 Contact Numbers for HIPAA Committee Members
- 🔍 Frequently Asked Questions
- 🔍 Policies and Procedures
- 🔍 Mandatory Postings
- 🔍 Office for Civil Rights Reference Materials

The two main contact points for HIPAA are:



E-mail:
PrivacyOffice@selectmedical.com



HIPAA Question Line:
800.819.5571

Reporting Information

All employees are responsible for promptly reporting compliance incidents. All reports are investigated by the Compliance Department. At the conclusion of the investigation and based on recommendations by the Compliance Committee, timely and appropriate actions are taken.

How to Report a Compliance Incident

- 01** Ask your immediate manager or supervisor for help. If they are unavailable or you are uncomfortable reporting to them, you are encouraged to speak to their leader.
- 02** If your leadership is not available or if you are not comfortable reporting to them, please contact the company's Compliance Officer (see Reporting Contacts below).
- 03** If you believe there has been a violation of the law, the Code of Conduct, or any other element of the Compliance Program, contact the Compliance Officer using one of the compliance reporting methods outlined below. You may anonymously report a compliance incident by using the Hotline telephone number.

Reporting Contacts



Compliance Officer and HIPAA Privacy Officer

Bob Breighner
Telephone Number: 717.975.4535



Compliance Officer's Address

Attn: Compliance Officer
4714 Gettysburg Road
P.O. Box 2034
Mechanicsburg, PA 17055



Compliance Hotline Number

1.888.823.8945
Web-Based Reporting:
<https://selectmedical.alertline.com>



Anonymous P.O. Box

Compliance Committee
Attn: Compliance Officer
P.O. Box 3352
Shiremanstown, PA 17011

Resources

Your main source for accessing information related to the compliance program is through the Select Medical intranet site. In the HUB's search field, type "Index of Compliance." The resources available there include:

- Code of Conduct
- Newsletters
- Policies and Procedures
- Clinical Internal Audit Processes
- Contact Information
- Certification Forms
- Training Information
- Email the Compliance Officer

Our Commitment is now Your Commitment

Welcome to Select Medical. You are an integral part of improving quality of life. Always remember that compliance is embedded in our everyday decisions. We are here to help you, so please contact us when you have questions, concerns and suggestions about compliance.

Thank you for your hard work and dedication to serving others.



Remember, all your concerns - large or small - will be treated confidentially, and employees who make a good faith report are protected from any retribution by leaders or employees.

“Do the right thing, the right way, each and every time.”



Hotline:
1.888.823.8945