



Corporate Compliance Solutions

*Enhancing Your
Compliance Initiatives*

PRICEWATERHOUSECOOPERS 

Mastering the Dynamics of Change

Every day, the senior executives and board members of more than 4,000 healthcare organizations turn to PricewaterhouseCoopers for support in enhancing performance, building financial strength and protecting their reputations.

PricewaterhouseCoopers healthcare practice draws on the experience of an international organization that includes clinical and business leaders—and more physicians than any other Big Five firm. Because we're committed to healthcare, we continually invest in our people and knowledge. In addition to physicians, our healthcare practice includes nurses, information system specialists, management consultants, health policy analysts, actuaries, financial advisors and data analysts, who provide our clients with unmatched industry expertise.

Our Healthcare Regulatory Group is the world's largest regulatory practice serving integrated delivery systems, hospitals, physician practices, managed care organizations, ambulatory care sites, home health agencies and long-term care providers. Around the world, more than 2,000 professionals in the group work together to deliver six integrated lines of service that are critical to a healthcare organization's success.

Across the spectrum of healthcare delivery, we help organizations improve performance, preserve revenues, reduce costs, address compliance issues and create collaborative business approaches that build competitive advantage.

We offer unparalleled thought leadership through such programs as the annual Thought Leadership Forum, held in conjunction with the Harvard School of Public Health faculty, an endowed directorship for continuing professional education at Harvard, and frequent publications on emerging industry issues. We also publish *HealthCast 2010: Smaller World, Bigger Expectations*, a prospective view of healthcare in the next decade.

PricewaterhouseCoopers provides you the benefit of deep client relationships that bring real-life value to our engagements. We bring you intellectual capital from around the world to develop solutions. Our consultants monitor Capitol Hill, state houses, Wall Street and local managed care markets to help you understand the issues and make decisions that enhance your organization's mission, reputation and financial strength.

Healthcare Regulatory Group Six Lines of Service:

- ➔ Compliance
- ➔ Litigation Support
- ➔ Revenue Preservation
- ➔ Operations Improvement
- ➔ Corporate Integrity
- ➔ Mergers and Acquisitions

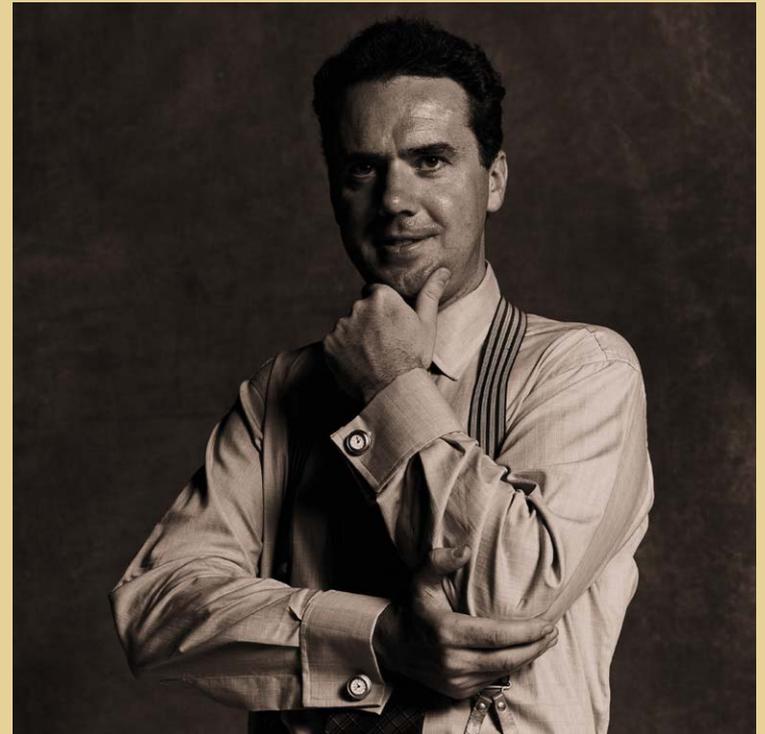
Unmatched Expertise in a Complex Regulatory Environment

Healthcare providers and payors are facing intensifying scrutiny by federal and state governments for possible fraud and abuse violations. Regulatory and accreditation bodies have also tightened operational requirements. This scrutiny has led to the realization that an integrated, comprehensive compliance program is no longer a luxury.

At PricewaterhouseCoopers, we specialize in the healthcare industry and we understand the complex regulatory issues that you face daily. That's why we incorporate those issues into our consulting and operational improvement services. During a corporate compliance engagement, we provide a dedicated group of healthcare regulatory professionals with in-depth skill sets that will put their expertise to work for you. They can tell you where and how to assess your risks at the operational level. Our specialists will also show you how to structure your compliance program to monitor, audit and mitigate those risks. Additional services include employee training and education, daily advice and council with our Compliance Office™ management tool, as well as fraud and abuse investigative services by specific segments.

Our experienced, multidisciplinary teams can provide a more thorough situation analysis in a shorter period than you could possibly achieve alone. And a quick response can significantly reduce your exposure if a non-compliance issue should surface.

We have spent years building and nurturing working relationships with all relevant regulatory and accreditation agencies. This means that the reputation and the integrity of our services can bring a stabilizing influence to any investigative process as well as enhance your organization's credibility.



The Benefits of Compliance

We believe there are two phases to the development and implementation of a compliance program: developing the overall program structure and operationalizing the program.

Many organizations have been developing their overall compliance program structure, including creating the compliance office. Resources exist in the industry including the Office of the Inspector General's (OIG) model compliance program, to provide guidance on the program structure.

The more difficult and challenging aspect of developing and implementing a compliance program comes when an organization tries to operationalize the program. We believe that an organization will only be able to demonstrate their compliance program is effective when the program has been integrated into the day-to-day operations of every department.

We believe an effective program creates an environment that reinforces your commitment to compliance while providing a framework to identify and correct potential issues of non-compliance.

We also believe that the compliance program should not impede or replace the organizational processes currently in place, but rather, complement and enhance them in order to create a more effective and efficient operation.

Our experience is that effective compliance programs deliver real benefits to any organization, including:

- Development of an integrated framework to manage compliance with laws and regulations
- Increased understanding of the operating risks applicable to the organization
- Strengthened operational consistency and coordination between departments
- Improved efficiency of response to government investigations and inquiries that often arise without notice
- Enhanced organizational control of the overall operations.



Corporate Compliance Solutions

PricewaterhouseCoopers offers comprehensive, customized solutions to your corporate compliance challenges. They can work together or stand alone.

Payor Compliance Expertise: We understand that payors have their own compliance regulations, issues and concerns. Only PricewaterhouseCoopers can offer an in-depth evaluation of these issues within any payor organization including third-party administrators. Our highly qualified specialists average 10 to 15 years of experience in their respective operational areas.

Provider Compliance Expertise: Provider's compliance regulations, issues and concerns are no less unique. Only PricewaterhouseCoopers can offer a comprehensive evaluation of compliance issues and all aspects of any provider organization. We have experienced consultants with 10 to 15 years of experience in managing all areas of provider operations.

Compliance Office™: PricewaterhouseCoopers is proud to offer this innovative, proprietary management system. This ever-evolving software enhances risk management activities by directly linking business risks to specific control procedures, oversight responsibilities and performance monitoring. We believe there is no other healthcare compliance tool on the market that is as comprehensive, functional and flexible.

Fraud and Abuse Investigative Services: Our consultants have extensive experience assisting clients and their counsel during federal and state investigations or through Qui Tam actions. Our consultants' investigative skills are combined with financial and economic acumen to support counsel in pre-litigation, arbitration and mediation, accurate intelligence and admissible evidence.

At PricewaterhouseCoopers, we have drawn on our vast global resources to provide successful customized corporate compliance solutions for numerous healthcare entities over a number of years. And we stand ready to provide the same services for your organization.



Compliance Services

Our flexible approach is what sets us apart from firms that treat compliance issues with a rigid “one size fits all” approach. We believe in building compliance directly into your existing processes and systems.

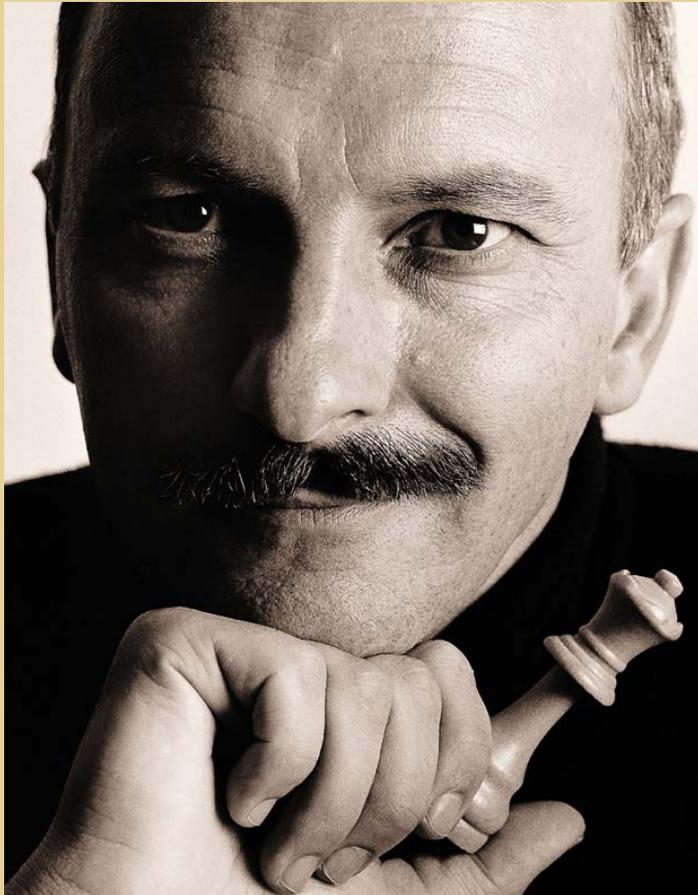
PricewaterhouseCoopers professionals can provide assistance in one or many aspects of your compliance program development and implementation:

Policies and Procedures: While organizations have some policies and procedures in place to mitigate compliance risks, our experience is that most organizations do not have all the necessary processes in place. We can review your existing policies and procedures to identify additional processes necessary to mitigate compliance risks in your organization. We can provide assistance in developing and implementing the additional policies and procedures.

Training and Education: Training may be needed to increase the knowledge of your managers, employees and medical staff of compliance related risks for your organization. We have conducted training sessions at all levels within healthcare organizations, including “train the trainer” sessions.

PricewaterhouseCoopers can conduct training and education sessions or provide materials for your team to use in conducting training and education sessions.





Monitoring: Controls are needed to ensure your organization continues to comply with applicable laws and regulations and identify issues of non-compliance immediately for resolution. We can provide assistance in identifying existing monitoring activities and build new monitoring controls to address any “gaps” identified.

Auditing: As organizations implement their compliance program, we have seen Boards ask whether the program is operating effectively. PricewaterhouseCoopers can help you address this question through an independent evaluation of your program. We can also perform audit services to independently evaluate your billing and coding practices or provide additional resources to supplement your audit resources.

Fraud and Abuse Prevention Services: Even though you may be doing “the right thing,” you may be subjected to an investigation by a federal agency. PricewaterhouseCoopers can provide you with one of the strongest and most experienced crisis response teams.

We have helped many of our clients and their attorneys successfully defend themselves in a government investigation. Additionally, we can provide assistance to your organization if you have identified a compliance issue internally and you are considering self disclosure.

PricewaterhouseCoopers—Value-added Services

PricewaterhouseCoopers professionals have served hospitals, third-party administrators, health systems, academic medical centers, managed care organizations, home health agencies, Medicare and Medicaid contractors, independent and hospital based clinical laboratories, renal dialysis facilities and other healthcare providers, payors and industry regulators in the following principal areas:

- Operational controls and process improvement
- Revenue cycle improvement
- Reimbursement and compliance
- Health information management
- Financial management
- Financial and business analysis
- Due-diligence reviews
- Strategic planning
- Audit services
- Internal audit outsourcing
- Payor specific tax services
- Provider specific tax services
- Dispute resolution services
- Mergers and acquisitions
- Human resource advisory services
- Internet-based physician training



Rated #1 in Client Satisfaction

In a recent independent survey by the Emerson Research Company, the Healthcare Practice of PricewaterhouseCoopers was rated number one in the delivery of overall client satisfaction.* The Practice had a leadership position (first or second) in more subcategories of satisfaction than any competitor—a leader in 12 of 14 areas measured.

PricewaterhouseCoopers is also a leader in the key driver that determines client satisfaction: understanding client needs and expectations.

Our Practice received more Five Star ratings than any other competitor, including:

- ❖ Partner responsiveness
- ❖ Knowledge of client's business
- ❖ Contribution to client's Industry

PricewaterhouseCoopers is committed to the healthcare industry. We are grateful to our clients for recognizing efforts. At the same time, we will continue striving toward best practices that meet and exceed their expectations.

* 99/00 Emerson Big Five Healthcare Industry Client Satisfaction Survey Study.

Note: PricewaterhouseCoopers was one of two firms to tie for overall client satisfaction leadership.

PricewaterhouseCoopers—Committed to Your Success

PricewaterhouseCoopers is the world's leading professional services organization. Drawing on the knowledge and skills of 155,000 people in 150 countries, we help our clients solve complex business problems and measurably enhance their ability to build value, manage risk and improve performance. PricewaterhouseCoopers refers to the U.S. firm of PricewaterhouseCoopers LLP and other members of the worldwide PricewaterhouseCoopers organization.

You can learn more about our services and contact us on the World Wide Web at www.pwcglobal.com/healthcare.



The vessel is a symbol for people from many different worlds working together and sharing knowledge. The shape of each vessel is formed by the classic optical illusion of two facing profiles. Their diversity reflects the many worlds in which PricewaterhouseCoopers people and our clients work together and share knowledge. Those worlds are the fundamentals underpinning our organization.

Your worlds



Our people