

Scope: All subsidiaries of Universal Health Services, Inc., including facilities and UHS of Delaware Inc. and their personnel.

Purpose: To establish the UHS policy and procedure for persons determined to be ineligible to perform any procedures and/or provide or order services that are paid in whole or in part by any federal or state health care programs.

To assure that no government health care program payment is sought for any items or services directed or prescribed by a physician, privileged practitioner or independent or dependent practitioner or contractor who provides and/or orders services and who is an ineligible person.

To assure that all UHS subsidiaries conduct appropriate checks as to exclusion and licensure status for applicable individuals and entities in accordance with applicable federal and state laws.

Policy: It is the policy of UHS to assure that no person or entity engaged as an employee, vendor, independent contractor, and/or provider of services, shall perform any procedures and/or provide or order services, if such individual or entity is determined to be ineligible.

Procedure:

It shall be the responsibility of all facility personnel and UHS personnel to inform the Chief Compliance Officer and the applicable Facility Compliance Officer and Human Resources Departments of any change in status that may cause an individual or entity to become an Ineligible Person.

An "Ineligible Person" shall include:

1. an individual or entity currently excluded, debarred, suspended, or otherwise ineligible to participate in the federal or state health care programs or in federal or state procurement or non-procurement programs;
2. an individual or entity that has been convicted of a criminal offense that falls within the scope of 42 U.S.C. § 1320a-7(a), or similar state statute, but has not yet been excluded, debarred, suspended, or otherwise declared ineligible; or
3. an individual or entity currently excluded on a state exclusion list.

It shall be the responsibility of each of the Human Resources Departments, under the general oversight of the Chief Compliance Officer, to periodically review the HHS/OIG List of Excluded Individuals/Entities ("OIG Sanction Report") and the General Services Administration's List of Parties Excluded from Federal Programs ("GSA List") or any state exclusion list. As a result of

this periodic review, should it be determined that there is an employee that has become an Ineligible Person, notification shall be made to the Chief Compliance Officer who shall notify the UHS Human Resources Department, the facility Human Resource Department, as well as the UHS Office of General Counsel.

Effective Date: 10-21-2010

Implementation Date: 10-21-2010

Reviewed and Approved by:

UHS Compliance Committee