

PATIENT ASSISTANCE CODE OF CONDUCT



*We speak
health and human.*



To our Patients, Donors, Partners, and Friends,

Accessia Health is committed, in every action we take, to ensuring that legal and regulatory compliance is ingrained in every aspect of our organization, culture, and people. While our mission is to support people living with rare or chronic health conditions, we must fulfill that mission with unwavering ethics and adherence to the highest standards.

We breathe life into this commitment through our Compliance Program and Patient Assistance Code of Conduct. The Compliance Program is designed to align with the 2005 and 2014 guidance issued by the Office of the Inspector General for the Department of Health and Human Services, as well as our [Advisory Opinion](#) which allows us to undertake our patient assistance model, and our [Modification](#) to that Opinion.

We are deeply proud of our Compliance Program and Code of Conduct, and take great pride in their operation. The following pages outline these standards, which serve as binding guidelines for our organization, board of directors, officers, and all contractors.

Should you have any questions about this document or our commitment to upholding our mission and values, do not hesitate to contact us.

Thank you for your continued trust in our organization.


Mitch Mula
Board Chair


Tiara Green, MS.Ed.
President



MISSION

To provide the financial safety net, products, services, and assistance to patients and families living with rare or chronic health conditions.

VISION

All people have access to healthcare regardless of their background.

Summary of the Accessia Health Compliance Program

Our Compliance Program Summary demonstrates our dedication to serving those with rare or chronic health conditions in an ethical, compliant, and purposeful way. We have implemented an effective program that fully meets all expectations articulated in the U.S. Sentencing Commission Guidelines. We take pride in our Compliance Program, the commitment to ethics and compliance it reflects, and the culture that we have built and live—every day.

Written Policies and Procedures— *Say It and Mean It*: Our commitment to compliance begins with articulating clear policies and procedures that address all key functions, activities, and potential risk areas. These guidelines break down and apply all the elements of both our [Advisory Opinion](#) and our [Modification](#), creating clear expectations for all individuals associated with Accessia Health—officers, employees, board members, and contractors alike.

Compliance Officer and Compliance Committee— *Leaders Build a Culture*: Our compliance officer, [Robert Jagielski](#), supported by our Compliance Committee, and our outside compliance adviser, [Bill Sarraile](#), are responsible for the design, implementation, refinement, and evolution of our Compliance Program. Together, our compliance officer, the Compliance Committee, the Board of Directors, and every member of Accessia Health's management team provide leadership in support of not only our Compliance Program, but the culture of compliance that supports and sustains it.

Our Compliance Committee, led by our compliance officer, is composed of the president, executive vice president of information systems, and the vice president of clinical strategy and patient engagement. Importantly, a member of the Accessia Health board of directors sits on the committee, ensuring that our Board is integrally involved in the organization's efforts. The committee meets monthly to discuss Compliance Program operations, questions or issues that may arise, possible refinements or improvements to the program, and all other relevant topics.

The compliance officer reports directly and independently to both the Board of Directors and the President of Accessia Health. The compliance officer also provides reports directly to the Board on a quarterly basis.

Training and Education— *Learning Is Growth*: Our Compliance Program is built on a foundation of mandatory training and education.

Every member of our organization receives mandatory training and education on the compliance and ethics issues that affect them— everyone from our patient services representatives to our senior executive team, to the members of our board. We also offer training to key contractors to ensure that they provide services reflective of our commitment to compliance.

Members of our team have been trained on the [Federal Anti-Kickback Statute](#), our [Advisory Opinion](#), the [Modification](#) to that Opinion, the laws and regulations affecting Tax Exempt Organizations, and HIPAA, among other relevant laws and sources of guidance.

Lines of Communication— *Lifting Our Voices*: At Accessia Health, we make communication integral to our Compliance Program in multiple ways.

Anyone with a question or concern is encouraged to speak with their immediate supervisor, the compliance officer, or any member of the Compliance Committee. In addition, questions or concerns can be raised anonymously by emailing a message to compliance@accessiahealth.org or calling 800-366-7741.

Upon request, questions or concerns will be kept confidential to the fullest extent possible consistent with the operation of the Compliance Program.

There shall be absolutely no retaliation for raising any compliance question or concern that is made in good faith. Retaliation taken by any person against anyone raising a question or concern in good faith will be subject to discipline up to and including termination of his or her relationship with Accessia Health.

Monitoring and Auditing— *Putting Our Program to the Test*: Accessia Health undertakes a multi-faceted and multi-layered process of testing through both monitoring and auditing. Our ongoing efforts include periodic auditing, reviewing reports, call monitoring – all in order to identify any potential issues. Other monitoring and audits are undertaken to respond to questions or issues as the need arises. In addition, Accessia Health monitors and audits patient transactions to ensure adherence to program guidelines.

Each year, an outside firm conducts an independent review of Accessia Health’s operations. This review considers compliance with the [Federal Anti-Kickback Statute](#), our [Advisory Opinion](#), our [Modification](#), and Tax Exempt Organization requirements, among other laws and guidance.

Disciplinary Guidelines— *Accountability Matters*: Everyone associated with Accessia Health – its officers, board members, employees, and contractors—are all subject to appropriate discipline if they fail to meet any Compliance Program-related expectation, whether called for by the letter or the spirit of the Compliance Program. This provision overrides any other policy, procedure, handbook, or other statement by Accessia Health.

Responding Promptly to Detected Potential Issues— *We Respond, Address, and Remediate*: If compliance issues arise, the compliance officer performs an initial assessment, seeking input, as appropriate, from the Compliance Committee and outside compliance advisors, including legal counsel.

Whenever that assessment indicates that a further response is warranted, the compliance officer, with input from the Compliance Committee and the Board, as appropriate, determines a response plan.

At the conclusion of the steps deemed appropriate as a response, including a responsive audit or internal investigation, the compliance officer, with input from the Compliance Committee and the Board, as appropriate, takes ALL necessary steps to address the issue, including ALL remediation deemed appropriate.



Patient Assistance Code of Conduct

Accessia Health has adopted the following Code of Conduct for all patient assistance funds that include any federal program beneficiaries. The Code is built on the principles and core provisions of our [Advisory Opinion](#) and our [Modification](#), and it reflects expectations that all other Patient Assistance Organizations are obligated to meet, as a condition of their advisory opinions and modifications.

Independence and Autonomy: The founding principle for a charity operating under the OIG guidance, and in connection with disease funds that include federal program beneficiaries, is that the charity operates in a manner that preserves its absolute independence and that it acts in an autonomous manner. Accessia Health abides by this principle, allowing us to help individuals pay for their healthcare costs in a manner driven by our mission and our commitment to the patient.

Design and Modification of Funds: Accessia Health does not solicit suggestions from donors, prospective donors, or affiliates of a donor or prospective donor regarding the identification, delineation, or modification of disease funds. Accessia Health is not able to accept requests or suggestions from donors, prospective donors, and their affiliates regarding the identification or modification of a fund. The identification, delineation, or modification of a fund includes, but is not limited to, such issues as the condition or disease covered, the items or services for which assistance may be provided, the levels of assistance or support available, and the eligibility criteria used.

Eligibility: The determination of eligibility criteria is a core means by which Accessia Health defines its mission. Accessia Health makes all financial eligibility determinations using its own criteria. Our eligibility criteria does not take into account the identity of any donor, prospective donor, affiliate of any donor or prospective donor, physician, provider, or supplier of services or items, including any drug or medical device. Accessia Health's eligibility criteria does not take into consideration the fact of, or the amount of, any contribution made by a donor or any other person.

First-Come, First-Served: Requests for financial assistance are reviewed by Accessia Health on a strict first-come, first-served basis. If a disease fund serving any federal program beneficiary is closed because of a temporary lack of funds, potential recipients of assistance are offered the opportunity to have their place maintained on a waiting list. If funds become available thereafter, Accessia Health makes those funds available to patients on the waiting list on a first-come first-served basis.

Freedom of Choice: Accessia Health's design and operation of its disease funds and its absolute respect for patient freedom of choice interposes Accessia Health between donors, prospective donors, and their affiliates, on the one hand, and patients, on the other, in a manner that effectively insulates beneficiary decision-making. Accessia Health does not refer applicants to or recommend items services, providers, practitioners, or suppliers of items or services. Freedom of choice includes the freedom to change items or services, providers, practitioners, or suppliers at ANY time for ANY reason.

Donations and Limits on Identification of Sponsors: Donors may earmark their donations to particular funds, but otherwise donations are unrestricted. Accessia Health does not inform applicants or recipients of assistance of the identities of donors, and donors do not receive any information regarding either patients or other donors. A list of donations may otherwise be made publicly available as permitted by our [Advisory Opinion](#) or as required by law.

Requests for Donations: Accessia Health may provide donors with quarterly or monthly projected estimates of fund needs, in aggregate, as well as information concerning when a particular disease fund is likely to be exhausted, based on current donations and assistance provided to fund enrollees. Quarterly or monthly reports to donors may also, in aggregate, provide information on the total number of patients receiving assistance by a fund.

Aggregate Reporting and the Protection of Patient Information: Accessia Health does not provide donors, prospective donors, or affiliates of donors or prospective donors with any individual patient information or any data related to the identity, amount, or nature of the drugs, devices, or services subsidized by an Accessia Health disease fund that includes any federal program beneficiary.

Our reports to donors will not contain any information that would enable a donor or affiliate of a donor to correlate the amount or frequency of donations with the number or medical condition of patients who use the donor's products. We will not respond to donors or affiliates of donors that request information, directly or indirectly, that would enable them to correlate donations to the level or amount of assistance provided for a given donors' products or services. Donors should identify all affiliates to us to help ensure compliance with this standard.

Accessia Health does not provide information to donors, prospective donors, or their affiliates regarding the waiting lists maintained by Accessia Health.

Accessia Health may provide monthly or quarterly aggregate reports to donors that disclose certain aggregate information. Specifically, Accessia Health may provide the number of all applicants for assistance to a disease fund and the aggregate number of patients qualifying for assistance in that fund.

Interpretation: Every element of the Code should be interpreted broadly. Any questions about this Code and its interpretation should be directed to the compliance officer.

Application of the Code: Our Code is binding on our entire organization, board, officers, employees, and all contractors. Additional expectations have been created related to other funds, activities, and functions, and those expectations should be separately considered, wherever applicable.



Our mission is to support people living with rare or chronic health conditions and we fulfill that mission with unwavering ethics and adherence to the highest standards.

REPORTING CONCERNS

If you have concerns about Accessia Health's compliance efforts or suspect fraud, waste, or abuse, you can report it to us through our compliance officer and we will take all appropriate actions in response. Please see the "Lines of Communication" section above for more observations about reporting any issue or concern.

COMPLIANCE CONTACT

Robert Jagielski, JD

804-286-1807

compliance@accessiahealth.org



We speak health and human.



P.O. Box 5930
Midlothian, VA 23112