

## **Commitment to Compliance**

We are committed to providing superior quality diagnostic and therapeutic imaging healthcare services to our customers in full compliance with all federal, state, and local laws, especially those designed to prevent fraud, waste, and abuse.

In order to ensure compliance with all appropriate laws and regulations, we have implemented a compliance program to ensure we meet or exceed all applicable laws and regulations. A compliance program is a set of internal controls that a company develops to prevent, detect, and resolve illegal or unethical conduct that may occur.

### **Following the federal recommendations for an effective compliance program, we have:**

1. Adopted written policies and procedures which include a Code of Conduct.
2. A mandatory annual HIPAA training program which is tailored to each employee's individual responsibilities, including training regarding our compliance program, fraud, waste, and abuse, reimbursement, and other federal, state, and local rules and regulations.
3. Established an employee 24/7 hotline (NAVEX Global®) that permits employees a confidential method to disclose compliance concerns on an anonymous basis. All calls to the hotline are toll-free and cannot be traced.
4. Appropriate screening methods to ensure that we do not knowingly employ or contract with persons or entities that are prohibited from doing business with the federal government.
5. Implemented routine internal audits to ensure compliance with all regulatory requirements, such as Medicare billing, OSHA, etc. by performing regularly scheduled coding and billing audits as well as a yearly risk analysis.
6. Appropriate written discipline guidelines distributed to all employees and consistently enforced.
7. Created a Compliance Committee to monitor compliance activities and ensure the continuing effectiveness of our compliance program.

### **Dominion Radiology Associates, PLLC / Dominion Imaging, LLC**

Corporate Compliance Officer: **Neil Green, M.D.**

For questions or comments regarding our compliance program, please call (804) 486-4626.