



# VISIONQWEST Healthcare GROUP

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## **Compliance & Ethics**

VisionQwest is committed to the highest standards of ethics and integrity. The Compliance Department is designed to provide guidance to all VisionQwest employees and contractors regarding VisionQwest's ongoing commitment to conduct its affairs in accordance with applicable laws, standards, and sound ethical business practices.

### **A word from VisionQwest's Chief Compliance Officer**

At VisionQwest, our commitment to our patients and to our clients is to provide the best care possible. We fulfill that commitment by promoting adherence to ethical business practices, all applicable clinical, regulatory, and legal standards, VisionQwest's policies and procedures, and VisionQwest's Code of Conduct.

Over the past few years, our commitment to our patients and clients has helped VisionQwest become a leading provider of healthcare services across the nation. Along the way, we have experienced many important successes but there have also been challenges. In 2010, we introduced VQHGCompliance, a company-wide compliance initiative, which addresses these challenges by strengthening our compliance resources, education, and infrastructure.

Since its inception, VQHGCompliance has resulted in several important improvements. These include enhanced auditing and monitoring programs; improved systems for timely reporting of and response to potential issues; and installation of improved internal controls to help prevent recurrence of potential issues. VQHGCompliance has also emphasized the importance of proper education and continual training of our employees. That is why VisionQwest employees, at all levels and disciplines, participate in compliance training programs. That is also why we are working to make compliance a cornerstone of all of our training programs going forward.

Like any company-wide compliance initiative, VQHGCompliance is a continuous improvement process. It involves assessing risks, developing controls, monitoring performance, and implementing corrective actions and process enhancements. Compliance is a fundamental part of VisionQwest's mission and culture. It is also a crucial element to maintaining the high quality of care and service we provide to our patients and clients. At VisionQwest it is our goal to continually find ways to strengthen VisionQwest's compliance program and compliance infrastructure so that each and every VisionQwest employee is consistently living up to our commitment to our patients, clients, insurers, and each other.

On behalf of all of us at VisionQwest, thank you again for your support and confidence in our partnership.

Sincerely,

**Michael L. Lodge**

President & CEO, CCO

VisionQwest Healthcare Group