Policy or Procedure Subject: Contract Management		LC.PY.014.r00
Department or Section: Office of Ethics and Compliance		
Prepared By: W. Dalton, Deputy Compliance Officer	Supervisor Approval: A. Macumber, Operations Director Lab	Laboratory Director Approval: D. Henderson, VP Lab Operations

Policy:

To avoid Stark regulatory risks, it is prudent for healthcare organizations to establish a centralized legal contract review and records retention process.

This process should include a method of tracking contract expiration and require a review for renewal, prior to renewal, to ensure that the agreed upon conditions are still in line with sound business practices.

Approach:

This policy will outline the management of the following contract types: (1) Business Associate Agreements; (2) Technical Service Agreements; (3) Independent Contractor Agreements; (4) Lease agreements; (5) Interface and/or IT agreements; (6) Engagement Letters; (7) Service Contracts and (8) Physician/Laboratory Agreements.

It is important to note that all agreement types have a standard agreement template that has been vetted through Company counsel prior to use. Any changes to any template must be approved by Counsel and the Office of Ethics and Compliance prior to use.

Procedure:

1.) Request for contract initiation is made.
2.) For Technical Service Agreements (Insurance Bill) and Business Associate Agreements, the agreement is drafted by the Office of Ethics and Compliance.
3.) For Technical Service Agreements (Client Bill), a designated member of the Laboratory Sales team in leadership will draft the agreement.
4.) For Independent Contractor Agreements, a member of the Laboratory Administrative Leadership team shall draft the agreement in conjunction with Human Resources.
5.) For Lease agreements, the Chief of Staff will draft the agreement.
6.) ALL agreements, no matter the type, should be fully executed once it has become known that the business agreement relationship will begin in a timely manner, preferably one week or less.
7.) All fully executed agreements need to be returned to the Office of Ethics and Compliance for proper filing and tracking.
8.) All agreements will be loaded onto the Corporate Compliance Committee SharePoint site under the "Contracts' folder and in their specific sub-folder (i.e., Leases, TSA's Client Bill, etc.).
9.) All agreements will also be loaded onto Omni Assistant software for document control, in the event that the records in the SharePoint folder are compromised.
10.) All paper copies of fully executed agreements need to be filed with the Office of Ethics and Compliance.

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11) Depending upon the type of agreement executed, there shall be a defined time period that each agreement needs to be reviewed after execution to ensure the terms of the agreement are being upheld.
12.) If it is noted that all or part of the agreement is no longer relevant, the agreement shall be discontinued, and this shall be noted on the agreement paper copy and online by moving the agreement to an Archived Agreements folder.
13.) If changes need to be made to the agreement while the terms of the agreement are still active, an addendum will need to be issued.
14.) Each addendum will need to be signed by both parties and sent to the Office of Ethics and Compliance for filing and tracking.
15.) It is strongly suggested that addendums to agreements be vetted through the Office of Ethics and Compliance prior to execution, in the event that the verbiage needs to be review by counsel.

Reviewed By	Date
Lab Director: Don Henderson Signed: Don Henderson	8/17/21
Lab Manager: Amber Macumber Signed: Amber Macumber	8/18/21
Technical Supervisor: Amro Almradi Signed: Amro Almradi	8/19/21

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