

### **Vendor Compliance Survey:**

In order to assist Ochsner Health and its Affiliates ("Ochsner") in complying with federal law concerning financial arrangements between physicians and entities that provide certain healthcare services, Ochsner requires that new vendors provide Ochsner with the following information.

For purposes of this Survey, the following definitions apply:

"Affiliate" means any entity directly or indirectly owned or controlled by, owning or controlling, or under common control with Ochsner Clinic Foundation.

"Immediate Family Member" means any of the following individuals: husband or wife; birth or adoptive parent, child, or sibling; stepparent, stepchild, stepbrother, stepsister; father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law; grandparent or grandchild; or spouse of a grandparent or grandchild.

"Ochsner Facility" means any facility or portion thereof owned or controlled by Ochsner.

"Physician" means a doctor of medicine or osteopathy, a doctor of dental surgery or dental medicine, a doctor of podiatric medicine, a doctor of optometry, or a chiropractor.

1. Is your company owned, in whole or part, directly or indirectly, by a Physician who refers patients to or treats patients at any Ochsner Facility or an Immediate Family Member of a Physician who refers patients to or treats patients at any Ochsner Facility?
2. Is your company owned, in whole or part, directly or indirectly, by an Ochsner employed individual or by an Immediate Family Member of a Ochsner employed individual?
3. Is your company, or any entity directly or indirectly owned or controlled by, owning or controlling, or under common control with your company, an entity that provides healthcare services?
4. Does your company employ or contract with a Physician who refers patients to or treats patients at any Ochsner Facility or an Immediate Family Member of a Physician who refers patients to or treats patients at any Ochsner Facility?

If the answer to the Question 3 is Yes, then:

- (i) Does the employed or contracted Physician, or Immediate Family Member of the Physician, receive compensation from your company that is based on the volume/ value of referrals to any Ochsner Facility?

5. If you are entering into an arrangement as a vendor with Ochsner as an individual, are you a Physician who refers patients to or treats patients at any Ochsner Facility or an Immediate Family Member of a Physician who refers patients to or treats patients at any Ochsner Facility?

6. If you answered “Yes” to any of the questions above, please answer the following:

(i) Does Vendor have a written, signed contract with Ochsner?

Yes (if “Yes”, please attach a copy to this certificate.) No Contract Pending

(ii) Name each Physician, Immediate Family Member, and/or employee who has ownership in Vendor:

(iii) List each Ochsner Facility to which the Physician refers:

(iv) If applicable, name each Physician's Immediate Family Member(s) who have an ownership in Vendor:

### **Service Organization Control (SOC) Questionnaire**

1. Will you process financial transactions (such as credit card transactions) on behalf of Ochsner Health or any of its partners or subsidiaries?

2. Will you provide a service that Ochsner Health relies upon for its own financial reporting?

3. Will you store or transfer confidential information (e.g., PHI or PII) from Ochsner Health hosted systems to your own hosted systems?

4. Will employees, subcontractors or other representatives of your organization be granted ongoing access to Ochsner Health?

### **Foreign Corrupt Practices Act (FCPA) Questionnaire**

1. Is the contracting party (company or individual) incorporated/domiciled in a jurisdiction outside the U.S.?

2. Is the contracting party a wholly owned subsidiary of a company incorporated/domiciled outside the U.S.?

3. Is the contracting party (company or individual) providing services outside the U.S. for Ochsner?
4. Is the contracting party representing Ochsner on its behalf to third parties outside the U.S.?
5. Will the contracting party (company or individual) must interact or engage with third parties located outside the U.S. to perform its obligations to Ochsner? (Contracting party can be within U.S. during such interaction.)