

**Disclosure Summary**  
**Title: FY2023 Annual Referral Source Arrangements Education**  
**CME Presenter and Planning Committee Disclosure Report**

INTEGRIS *Health* Continuing Medical Education Department must ensure balance, independence, objectivity and scientific rigor in all its activities. We have implemented a process where everyone who is in a position to control the content of an education activity has disclosed to us all relevant financial relationships with any commercial interest. In addition, should it be determined that a conflict of interest exists as a result of a financial relationship one may have, this will be resolved prior to the activity. This policy is designed to provide the target audience with an opportunity to review any affiliations between the CME organizers/presenters and supporting organizations for the purpose of determining the potential presence of bias or influence over educational content. The following is a summary of this activity's disclosure information.

<b>CME Role</b>	<b>First Name</b>	<b>Last Name</b>	<b>Disclosures</b>
CME Presenter	:Lea	Fourkiller, JD	I have no financial relationships or affiliations to disclose.
CME Planner	Ryan	Whitehill, CHC	I have no financial relationships or affiliations to disclose.

**Steps Necessary to Complete Activity:**

1. Review all documents
2. Watch the video presentation
3. Complete the post-test with at least 80% accuracy
4. Complete the Acknowledgement form
5. Complete the course evaluation

**Original Release Date:** 10.17.2022

**First Review:** N/A

**Most Recent Review:** 10.12.2022

**Expiration Date:** 10.16.2025

**Title:** FY2023 Annual Referral Source Arrangements Education

**Target audience:** All physicians and providers

During this presentation, Lea Fourkiller, JD reviews the laws, regulations and policies related to referral source arrangements and the risks involved in these arrangements. Topics covered include: defining a referral source, risks involved in referral source arrangements, how the Stark Law and Anti-Kickback Statute affect our work, our current and upcoming safeguards in this area.

**Learning Objectives:**

1. The students will be able to identify the definition of a referral source.
2. The students will be able to identify risks involved with referral source arrangements.
3. The students will be able to identify how the Stark Law and Anti-Kickback Statute affect our work.
4. The study will be able to explain our current safeguards in this area.
5. The students will be able to identify examples of common risks to be aware of in our everyday environment.
6. The students will be able to explain how to report a potential compliance matter.

**Accreditation and Designation:**

**Accreditation Statement:** The INTEGRIS Health System is accredited by the Oklahoma State Medical Association to provide continuing medical education for physicians

**Designation Statement:** The INTEGRIS Health System designates this enduring material for a maximum of 0.25 *AMA PRA Category 1 Credit*<sup>™</sup>. Physicians should claim only the credit commensurate with the extent of their participation in the activity.

**Disclosure Statement:** The Presenter/Planners and CME Planning and Review Committee have no relevant financial relationships to disclose. The CME Department has reviewed the speaker's information and has resolved all conflicts of interest, if applicable.

**Author:** Lea Fourkiller, JD

**Author biography:** Lea Fourkiller is the Corporate Compliance Office for INTEGRIS Health, the largest Oklahoma-owned not-for-profit health system in the state. INTEGRIS Health is known for innovation and unparalleled quality offerings, advanced treatment options and specialties. The organization includes hospitals, rehabilitation centers, physician clinics, mental health facilities, independent living centers and home health agencies. INTEGRIS Health operations cover more than 1,800 licensed beds over 16 health hospitals and four community hospitals. The system offers more than 170 family care and specialty clinics and employs more than 10,000 caregivers. Its services include a clinically integrated network of more than 1,500 affiliated physicians and providers, of which more than 600 are employed.

Prior to joining INTEGRIS Health, Lea was a Managing Director at Ankura. Lea has more than 30 years of experience in diverse operational, legal, and compliance, particularly in healthcare and petroleum marketing and refining. She has worked with non-healthcare corporations, sovereign nation government healthcare systems, and for-profit and not-for-profit healthcare systems. Her expertise is in healthcare compliance, contracting, policy development and execution, procedures and initiatives, marketing and promotions, and advisory at all levels of an organization on various issues. Lea has developed and executed healthcare compliance programs and initiatives for over 15 years, creating general and specialized employee training and development sessions, implementing process improvements, investigating complex compliance issues, performing compliance program effectiveness reviews and evaluations, and advising all levels of the organization on ethics and compliance issues.

Her healthcare experience includes health systems, single hospitals, children's hospitals, rehabilitation units, and ambulatory care clinics. In addition, she has experience navigating a significant corporate integrity agreement, during which, as part of the compliance department leadership, she worked closely with the company president and the various corporate compliance committees. Accordingly, she collaborated with the human resources, legal, operations, and financial management departments. Lea is an experienced chief compliance officer at the corporate, regional, and local levels. She has more than 16 years of experience in management at a major oil corporation where she was responsible for federal tax filings, developing the sales and use tax department, monitoring regulatory requirements, and providing in-house legal counsel for the marketing, refining, petrochemicals, lubricants, and treasury departments.

Lea's professional experience includes:

Vice president and chief compliance officer for Conifer Health Solutions where she was responsible for developing, implementing, and leading the values-based ethics and compliance program encompassing revenue cycle, physician services, consumer finance, conflict of interest, and value-based care.

Regional compliance director at Tenet Healthcare where she oversaw the compliance and ethics efforts of 13 hospitals, supervised regional compliance staff, collaborated with hospital leadership to develop and implement compliance and ethics programs, investigated compliance-related issues, and chaired the regional compliance committee.

Compliance officer for three Tenet Healthcare hospitals in Dallas, Texas, where she developed compliance champions and monitored compliance and ethics at three Dallas/Fort Worth Metroplex hospitals. She served as chair of the hospital committees and advised hospital leadership and governing boards on compliance and ethics matters.

Compliance officer and contracts administrator for the Eastern Band of Cherokee Indians & Indian Health Services and part of the leadership team effectuating self-governance for the Eastern Band of Cherokee Indians healthcare funding.

Operations and in-house counsel for a major oil marketing and refining corporation. Lea is a faculty member for Health Care Compliance Association Healthcare Academies and the Society

of Corporate Compliance and Ethics Academies and speaks at their events on topics including the development, implementation, auditing and monitoring, and effectiveness of ethics and compliance programs. She is also a member of the item writing committees for the compliance and privacy certification examinations.

**CME Provider Contact Information**

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