

ANTITRUST POLICY STATEMENT FOR AMERICAN HOSPITAL ASSOCIATION FORUMS

This forum will bring together representatives of hospitals and health systems that may be competitors to explore issues that might provide general benefit to participants in the health care field. Although the subject matter of these discussions is not intended to restrain competition in any manner, it is important for everyone to recognize that this forum conceivably could be characterized as an opportunity for inappropriate information exchanges or agreements that could result in anticompetitive or otherwise unlawful conduct in violation of the antitrust laws.

It is the intent of all participants that this forum and their participation in it will comply fully with all legal obligations. In particular, any discussions or agreements that could raise antitrust issues are entirely beyond the bounds of this meeting, and the advice of legal counsel should be sought if there is any question in this regard. If you have any questions about the appropriateness of a discussion topic or a particular piece of information to be shared, please consult your own counsel or a SHSMD representative before sharing it with the group.

Topics that should not be discussed include:

1. Prices, rates, discounts, or other price-related information;
2. Salaries or other compensation information;
3. Nonpublic plans for expansion (new facilities, new services);
4. Specific customers or classes of customers, or whether you will or will not do business with them;
5. Allocation of geographic or service markets;
6. Any refusal to deal with a health plan, self-funded employer, or supplier;
7. How to deal with the market behavior of a competitor; or

8. Any other topic involving any possible anticompetitive practice.

These discussions and any actions resulting from them are not intended to play any role in the individual competitive business decisions of the participating hospitals and health systems, nor in any way restrict competition among them. It is the responsibility of every participant to be guided by this policy of strict compliance with the antitrust laws and to raise any concerns with possible violations of this policy promptly.