

 <p>HAWAII HEALTH SYSTEMS CORPORATION Quality Healthcare for All</p> <p>POLICY</p>	<p>Department:</p> <p>Corporate Compliance</p>	<p>Policy No.</p> <p>CMP 0002A</p>
		<p>Supersedes Policy No.</p>
<p>Subject:</p> <p>Audit and Compliance Committee, Corporate Compliance Committee, Chief Compliance and Privacy Officer</p>	<p>Approved By:</p> <p><i>Brenda S. Ho</i></p> <p>HHSC Board of Directors By: Brenda Ho Its: Secretary/Treasurer</p>	<p>Approved Date:</p> <p>April 23, 2026</p> <p>Last Reviewed:</p> <p>April 23, 2026</p>

I. PURPOSE:

To establish the responsibilities of the Audit and Compliance Committee (ACC), the Corporate Compliance Committee (CCC), and the Chief Compliance and Privacy Officer (CCPO) for oversight of the Hawaii Health Systems Corporation (HHSC) Corporate Compliance Program.

II. DEFINITIONS:

Audit and Compliance Committee ("ACC"): A subcommittee of the Hawaii Health Systems Corporation Board of Directors, established in the bylaws of the Board, with primary responsibility for oversight of the Corporate Compliance Program (the "Compliance Program"). The ACC is responsible for planning, overseeing, implementing, administering and enforcing the elements of the Compliance Program.

Corporate Compliance Committee (CCC): A committee, chaired by the CCPO, that provides subject matter expertise, input, and guidance to support the Compliance Program and the ACC.

Chief Compliance and Privacy Officer (CCPO): An HHSC employee with primary operational responsibility for the Corporate Compliance Program, including implementation, monitoring, reporting, and advising leadership on compliance matters.

III. POLICY:

- A. The ACC of the HHSC Board of Directors has primary oversight responsibility for the HHSC Corporate Compliance Program, as established in the HHSC Corporate Bylaws. Membership of the ACC is defined in the HHSC Bylaws.
- B. The CCC shall serve as an advisory and support body to the ACC and CCPO. Membership shall include, at a minimum, the CCPO (Chair), the HHSC President and Chief Executive Officer, the HHSC Vice Presidents of the Corporation, and the Regional Compliance Officers.

- C. The Chief Compliance and Privacy Officer has direct operational responsibility for the Corporate Compliance Program. The CCPO shall report directly to the ACC at least quarterly, or more frequently as requested by the ACC or Board of Directors. The CCPO will also work closely with the President and Chief Executive Officer, Vice Presidents, and Regional Chief Executive Officers to ensure program effectiveness.
- D. The CCPO shall have unrestricted, direct access to the ACC, the President and Chief Executive Officer, and other members of the Board of Directors. HHSC shall ensure that employees with compliance-related responsibilities are provided adequate time and resources to perform their duties effectively.
- E. The Chief Compliance and Privacy Officer shall have the necessary authority to obtain and review all documents and other information relevant to compliance function in a timely manner.

IV. APPLICABILITY: This policy shall apply to all HHSC facilities, employees, contracted providers, volunteers, and medical staff members.

V. AUTHORITY:

- U.S. Department of Health and Human Services, Office of Inspector General (OIG), *Compliance Program Guidance for Hospitals* (Federal Register, Vol. 70, No. 19, January 31, 2005).
- HHSC Board of Directors Bylaws.

VI. RELATED PROCEDURE(S):

- CMP 0002B

VII. REFERENCE(S): None.