
 <p>HAWAII HEALTH SYSTEMS CORPORATION <i>Quality Healthcare for All</i></p> <p style="text-align: center;">PROCEDURE</p>	<p>Department:</p> <p style="text-align: center;">Corporate Compliance</p>	<p>Policy No.</p> <p style="text-align: center;">CMP 0002B</p>
	<p>Subject:</p> <p style="text-align: center;"><i>Audit and Compliance Committee, Corporate Compliance Committee, Chief Compliance and Privacy Officer</i></p>	<p>Approved By:</p>  <p>By: Edward N. Chu Its: HHSC CEO</p>

I. PURPOSE: To establish and define a process for implementation of Policy 0002A for the Audit and Compliance Committee (ACC), Corporate Compliance Committee (CCC), and Chief Compliance and Privacy Officer (CCPO), ensuring effective oversight, governance, and accountability for the HHSC Corporate Compliance Program. This procedure aligns with OIG, DOJ, and HCCA guidance for corporate compliance programs.

II. PROCEDURES:

A. Audit and Compliance Committee (ACC):

1. Purpose: The ACC is a subcommittee of the HHSC Board of Directors with oversight responsibility for the HHSC Corporate Compliance Program. IT ensures integrity, accountability, and effectiveness of compliance efforts.
2. Composition: As defined in HHSC Corporate Bylaws.
3. Meetings: As defined in HHSC Corporate Bylaws.
4. Attendance: As defined in HHSC Corporate Bylaws.
5. Committee Responsibilities: Specific responsibilities of the ACC Committee shall include, but shall not be limited to, the following:
 - a. Overseeing audit functions, review findings, and recommend Board-level decisions.
 - b. Review Corporate Compliance statistics and workplans as presented by the Chief Compliance and Privacy Officer.
 - c. Monitor implementation of compliance complaint mechanisms, ensuring timely investigation and resolution.
 - d. Recommend policies, budget items, or actions necessary to achieve compliance program goals.
 - e. Review investigative results and disciplinary recommendations.
 - f. Oversee IT Security reports.
 - g. Oversee risk assessments and reviews, including fraud, abuse, billing, and operational compliance issues.

- h. Approve engagement of external legal or financial consultants for targeted reviews or investigations.
- i. Ensure follow-up on corrective action plans until resolution.

6. Minutes: Maintain confidential, access-controlled minutes.

B. Corporate Compliance Committee (CCC):

1. Purpose: The CCC provides subject matter expertise for the Corporate Compliance Program, advising the CCPO, ACC, and the Regional CEOs on matters, policy development, and mitigation strategies.
2. Composition: The membership of the Corporate Compliance Committee (CCC) is to reflect a diverse range of skills and expertise, and will include representation from each of the geographic regions, which comprise the System.
3. Permanent members: The membership is to consist of the following eight (8) permanent members:
 - a. The Chief Compliance Officer and Privacy Officer (CCPO) (Chair)
 - b. The Vice President and General Counsel
 - c. The Vice President and Chief Financial Officer
 - d. The Vice President and Chief Human Resources Officer
 - e. The Regional Compliance Officers (4).

Other members: Invited based on expertise or operational needs, including Internal Audit, IT Security Director, Director of Revenue Cycle, and other key personnel.

Committee Responsibilities:

Advise ACC and CCPO on annual and targeted risk assessments.

- a. Review internal and external audits, financial and legal reviews.
- b. Support development of training, education, and remediation plans following reviews.
- c. Assist ACC with policy, program and risk-related initiatives.
- d. Monitor implementation of corrective actions and reviews from audits.

4. Minutes: Maintain confidential, access-controlled minutes.

C. Chief Compliance and Privacy Officer (CCPO):

1. Purpose: The CCPO is responsible for the daily operation of the Corporate Compliance Program, ensuring legal, regulatory, and ethical adherence across HHSC.
2. Responsibilities:
 - a. Serve as staff liaison and reporting officer for the ACC.
 - b. Chair CCC meetings; report at each ACC meeting on compliance status.
 - c. Oversee compliance policy implementation, monitoring, and enforcement.

- d. Conduct or oversee investigations of potential legal or regulatory violations, maintaining attorney-client privilege when required.
- e. Develop and track corrective action plans; report progress to ACC and CCC.
- f. Ensure annual compliance risk assessments and targeted reviews are conducted including engagement of external consultants when appropriate.
- g. Oversee compliance training programs and monitor completion.
- h. Ensure employees, contractors and agents are aware of compliance program requirements.
- i. Collaborate with Human Resource Departments and Regional Leadership on personnel and disciplinary matters in accordance with policies, collective bargaining agreements and the law.
- j. Periodically update the Corporate Compliance Program in response to regulatory, operational, or policy changes.
- k. Report independently to the Board or ACC if necessary to ensure compliance integrity.

D. Confidentiality and Conflict of Interest: All ACC and CCC members invitees, and supporting staff shall maintain confidentiality of proceedings, reports, and investigative findings.

III. APPLICABILITY: These procedures shall apply to the committees and position referenced herein.

IV. REFERENCES:

- HHSC Policy CMP 0002A
- HHS OIG Compliance Program Guidance (latest)
- DOJ Evaluation of Corporate Compliance Programs (2023 update)
- HHSC Code of Conduct

V. ATTACHMENTS: None