

 <b>HAWAII HEALTH SYSTEMS CORPORATION</b> <i>Quality Healthcare for All</i>	<b>Department:</b>  <b>Corporate Compliance</b>	<b>Policy No.</b>  <b>CMP 0009A</b>
		<b>Supersedes Policy No.</b>
<b>POLICY</b>	<b>Approved By:</b>  <i>Brenda S. Ho</i>	<b>Approved Date:</b>  April 23, 2026
<b>Subject:</b>  <b>Compliance Investigations</b>	HHSC Board of Directors By: Brenda Ho Its: Secretary/Treasurer	<b>Last Reviewed:</b>  April 23, 2026

**I. PURPOSE:**

To establish a structured and effective investigation process enabling Hawaii Health Systems Corporation ("HHSC") to promptly identify, assess, and remediate alleged compliance issues while ensuring regulatory compliance and protecting the rights of all individuals involved.

**II. DEFINITIONS:**

**Agent:** Any individual or entity authorized to act on behalf of HHSC, including contractors, subcontractors, or representatives who provide services to or perform functions for HHSC.

**Investigations:** A systematic process that may include interviews, review of records, audits, data analysis, and policy assessment, undertaken to determine the validity of an allegation or complaint and the appropriate remedial actions.

**Compliance Concern:** Any suspected violation of laws, regulations, HHSC policies, or ethical standards that may require an investigation.

**Corporate Compliance and Privacy Officer (CCPO):** Corporate Compliance and Privacy Officer of HHSC, responsible for overseeing compliance investigations, reporting, and corrective action.

**Regional Compliance and Privacy Officer (RCPO):** Compliance and Privacy Officer at each HHSC Region, responsible for overseeing compliance investigations, reporting and corrective action at the regional level.

**III. POLICY:**

A. Culture of Compliance. HHSC is committed to maintaining a culture of compliance with all applicable federal, state, and local laws and regulations. All persons associated with HHSC are expected to act ethically and in accordance with all applicable laws, regulations and policies. Any reports of suspected noncompliance, fraud, waste and abuse or unethical conduct will be investigated promptly, thoroughly and confidentially to the extent allowable by law and consistent with HHSC's legal and ethical obligations.

1. HHSC Facilities shall ensure that all employees are informed of the process for reporting Compliance Concern, and the responsibilities of the CCPO and RCPOs as it relates to Compliance Concerns.
2. All HHSC employees, volunteers, board members, contractors, and other agents are required to fully cooperate with compliance investigations.

B. Authority. The CCPO and the RCPOs at HHSC Facilities have the authority and responsibility to oversee, coordinate, and document all compliance-related investigations.

C. Corrective Actions. The CCPO and the RCPOs, in consultation with General Counsel and other individuals as needed, shall develop and assist in implementing appropriate corrective actions to address confirmed compliance violations, including remediation measures. HHSC shall report confirmed violations of criminal, civil or administrative law to the appropriate authorities in a timely manner, as required by law.

D. Non-Retaliation

1. Employees who report concerns in good faith are protected from retaliation at HHSC. Any act of intimidation, discrimination, or retaliation will result in disciplinary action.

**IV. APPLICABILITY:** This policy applies to all HHSC facilities.

**V. AUTHORITY:** This policy is established pursuant to applicable federal and Hawaii state laws, including but not limited to:

- HIPAA (45 CFR §§ 160, 164)
- False Claims Act (31 U.S.C. §§ 3729–3733)
- Anti-Kickback Statute (42 U.S.C. § 1320a–7b(b))
- Stark Law (42 U.S.C. § 1395nn)
- Office of Inspector General (OIG) Guidance
- Hawaii Revised Statutes (HRS) Chapters 321 and 92F
- Hawaii Administrative Rules (HAR) Title 14, Chapter 52
- Hawaii Department of Health Data Sharing Policies
- HHSC Corporate Compliance Plan (CMP 0001)

**VI. RELATED POLICIES AND PROCEDURE(S):**

- CMP 0009B – Compliance Investigations
- CMP 0011- False Claims Acts and Whistleblower’s Protection Act

**VII. REFERENCE(S):** None.