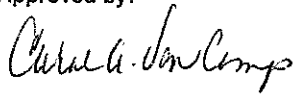
 <p>HAWAII HEALTH SYSTEMS CORPORATION "Touching Lives Everyday"</p>	<p>Quality Through Compliance</p>	<p>Policy No.:</p> <p>CMP 002A</p>
		<p>Revision No.:</p> <p>2</p>
<p>POLICY</p>	<p>Issued by:</p> <p>Audit and Compliance Committee</p>	<p>Effective Date:</p> <p>October 13, 2011</p>
	<p>Subject:</p> <p>Audit and Compliance Committee, Corporate Compliance Committee, Chief Compliance and Privacy Officer</p>	<p>Approved by:</p>  <p>HHSC Board of Directors By: Carol A. Van Camp Its: Secretary/Treasurer</p>
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I. **PURPOSE:** To describe the responsibilities of the Audit and Compliance Committee and the establishment and responsibilities of the Corporate Compliance Committee, and Corporate Compliance and Privacy Officer 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 ("HHSC") Board of Directors established in the bylaws of the Board with chief responsibility for oversight of the HHSC Corporate Compliance Program (the "Compliance Program"). As such, the ACC shall be responsible for planning, overseeing, implementing, administering and enforcing the many aspects of the Compliance Program.

Corporate Compliance Committee: A committee established as a subject matter expert group, led by the Corporate Chief Compliance and Privacy Officer, to support the Corporate Compliance Program.

Chief Compliance and Privacy Officer (CCPO): HHSC employee with primary responsibility for the operation of the Corporate Compliance Program.

III. **POLICY:**

- A. The Audit and Compliance Committee (ACC) of the HHSC Board of Directors has chief responsibility for oversight of the HHSC Corporate Compliance Program as established in the HHSC Corporate Bylaws. Membership for this Committee is established in the bylaws.
- B. The Corporate Compliance Committee shall be formed and maintained as a subject matter expert group to provide input and guidance for the Audit and Compliance Committee and the Corporate Compliance Program. Membership shall include at a minimum the Chief Compliance and Privacy Officer as Chair,

the HHSC President and Chief Executive Officer, the HHSC Vice Presidents of the Corporation, the Regional Chief Executive Officers, and the Regional Compliance Officers.

- C. The Chief Compliance and Privacy Officer has direct operational responsibility for the Corporate Compliance Program and that the HHSC President and Chief Executive Officer, and Vice Presidents of the Corporation retain active leadership roles with, and assist when needed in, the operation of the Corporate Compliance Program.
- D. The Chief Compliance and Privacy Officer shall have direct access to corporate decision-makers who have no personal or professional interest in the outcome of particular incidents or investigations. These corporate decision-makers include the ACC members, President and Chief Executive Officer of HHSC, and other members of the Board of Directors. All HHSC staff shall have sufficient time available in their regular working schedules to permit them to perform any compliance duties fully and 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.
- F. The Chief Compliance and Privacy Officer shall report to the ACC regularly as required.

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

V. AUTHORITIES: OIG Guidance as published in *Federal Register*, 70 (19): 1-31-05. *HHSC Board of Directors Bylaw reference.*