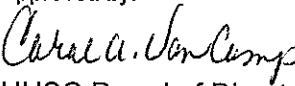


 HAWAII HEALTH SYSTEMS CORPORATION <i>"Touching Lives Everyday"</i> POLICY	Quality Through Compliance	Policy No.: CMP 009A
		Revision No.: 1
Subject: Compliance Investigations	Issued by: Audit and Compliance Committee	Effective Date: October 13, 2011
	Approved by:  HHSC Board of Directors By: Carol A. Van Camp Its: Secretary/Treasurer	Supersedes Policy: NA Page: 1 of 2

I. **PURPOSE:** To establish an investigation program so that Hawaii Health Systems Corporation ("HHSC") can swiftly and effectively respond to alleged compliance issues.

II. **POLICY STATEMENT:** HHSC policy is to promptly and thoroughly investigate all compliance-related issues, concerns, questions, or complaints.

III. DEFINITIONS:

Investigation: Methods such as interviews, data mining, policy review, auditing, etc, used to respond to an allegation or complaint to determine its truth and possible consequences.

IV. POLICY:

- A. HHSC shall investigate instances of suspected noncompliance to determine whether a material violation of HHSC's policies, conduct, practices, or procedures is a potential violation of criminal, civil, or administrative law.
- B. Any investigation shall be conducted as quickly as feasible.
- C. All employees, staff, volunteers, board members, and other agents shall cooperate fully with the investigation.
- D. HHSC shall report instances of conduct that violate criminal, civil or administrative law to the appropriate federal and state authorities after an investigation has been conducted.
- E. HHSC shall develop a corrective action plan including promptly identifying and repaying any overpayment to the appropriate payor, imposing appropriate disciplinary action and implementing corrective actions to remedy compliance violations.
- F. HHSC shall notify the Office of the Inspector General (OIG) of any ongoing investigation or legal proceeding conducted or brought by a government entity or its agents alleging that HHSC committed a crime or has engaged in fraudulent activities.

- G. If an employee requests confidentiality, the CCPO shall agree to comply with this request to the extent possible under the circumstances, but shall give no "blanket" guarantee.
- H. HHSC shall inform all of its employees of the names and telephone numbers of regional compliance officers and the Chief Compliance and Privacy Officer (the "CCPO") and the process for requesting an investigation or lodging a complaint.
- I. Most compliance investigations shall be conducted at the local or regional level. However, if unable to achieve satisfactory resolution at that level, the complainant shall contact the CCPO with any questions, comments or concerns they may have regarding compliance-related issues and the CCPO will conduct an investigation as necessary and appropriate.

V. APPLICABILITY: This policy applies to all HHSC facilities.

VI. AUTHORITY: HHSC Corporate Compliance Plan (CMP 0001).