

Ethics in Business Compliance Committee  
POLICY: AC.ETH.01.18

Date: December 10, 1999

Responsible to: President/CEO

**Purpose:**

To provide a functional group of individuals who represent all divisions, programs and departments throughout the center and affiliates. These individuals will serve as a forum for the operation of the Ethics in Business program and give guidance to the Chief Compliance Officer.

**Policy:**

The Ethics in Business Compliance Committee will be appointed by the President/CEO.

The committee shall advise the Chief Compliance Officer and have oversight responsibility for the Ethics in Business program.

**Committee Functions:**

1. Oversight and analysis of risk areas with direction being given to the Chief Compliance Officer.
2. Review of all audits and monitoring activities as presented by the Chief Compliance Officer.
3. Working with the Chief Compliance Officer to assist divisions, programs, or departments in solving issues that arise through the compliance program.
4. Forwarding appropriate issues that arise through the compliance program to the Performance Improvement Committee.
5. Make recommendations for the development of internal systems and controls to carry out the Ethics in Business Program.
6. Review and direct, as needed for all compliance line calls.
7. Reviews results and assistance as needed of all investigations either ongoing or completed.
8. Address other functions as the compliance concept becomes part of the center's overall operating structure and daily routine.

Membership:

Chief Compliance Officer (Chairman)  
President/CEO  
Vice President of Clinical Services/Chief Nurse Executive  
Chief Financial Officer  
Medical Director and/or Associate Medical Director  
Vice President of Research and Technology/Chief Information Officer  
Vice President of Building Services/Risk Management  
Program and Department Directors  
Executive Office Manager  
Other ad hoc members as needed

Meeting Schedule:

The committee will meet at least quarterly as part of the Senior Management Team meeting. Minutes will be taken as part of the Senior Management Team meeting minutes.

Agenda:

1. Compliance line reports.
2. Audit/monitoring results.
3. Investigation reports.
4. Policy discussion/approval.
5. Industry-wide Compliance updates.
6. Other Business.