

**Scope:** All subsidiaries of Universal Health Services, Inc., including facilities and UHS of Delaware Inc. and their personnel.

**Purpose:** Description and Reporting Responsibility of UHS Chief Compliance Officer

**Policy:**

## **I. DUTIES AND RESPONSIBILITIES**

The Chief Compliance Officer and UHS Compliance Committee oversee the UHS Compliance Program, which reviews and evaluates compliance issues/concerns within the organization relating to federal and state health care programs. The Chief Compliance Officer focuses on compliance with the rules and regulations of regulatory agencies, compliance with UHS policies and procedures, and assurance that behavior in the organization meets UHS's standards of conduct.

In addition, the Chief Compliance Officer is required to distribute the UHS Code of Conduct and the Compliance Manual, providing an overview the ethical principles and policies forming the basis of the UHS Compliance Program. The Chief Compliance Officer shall be under the supervision of and report to the UHS President.

### Primary Responsibilities

The Chief Compliance Officer shall:

- Organize and maintain UHS compliance policies and procedures as well as the UHS Compliance Manual and Code of Conduct.
- Assure that the Compliance Program effectively prevents and/or detects violations of law, regulations, UHS policies and procedures, and the Code of Conduct.
- Coordinate resources to assure the ongoing effectiveness of the Compliance Program.
- Implement and operate retaliation-free reporting channels, including an anonymous telephone Compliance Hotline and the Web Reporting internet-based reporting system available to all employees of UHS subsidiaries, and other related persons working with the UHS subsidiaries.
- Develop education programs for all employees of UHS subsidiaries, and other related persons working with the UHS subsidiaries.
- Audit and monitor, as necessary, physician activity logs, use of leased space and other contractual arrangements to assure consistency with contract terms and compliance with UHS compliance obligations.

- Assure that the internal controls are capable of preventing and detecting significant instances or patterns of illegal, unethical, or improper conduct by all employees of UHS subsidiaries, and other related persons working with the UHS subsidiaries.
- Assure that the system has effective mechanisms to reasonably determine that persons to be hired by UHS subsidiaries have not violated federal or state laws and regulations or engaged in improper or unethical conduct in their designated areas or responsibility.
- Coordinate as appropriate with legal counsel conducting or overseeing investigations of matters under the Compliance Program.
- Oversee all investigations, follow-up and, as applicable, resolution to investigations and other issues generated by the Compliance Program, including development of corrective action plans, as needed.
- Present reports on significant compliance matters and on the Compliance Program on at least a quarterly basis to the UHS Compliance Committee.
- Develop and coordinate appropriate compliance training and education programs for all employees and other related persons working with the UHS subsidiaries and assure the company's commitment to comply with all laws, regulations, company policies, and ethical requirements.
- Develop, coordinate, and/or oversee internal and external audit procedures for the purpose of monitoring and detecting any misconduct or noncompliance.
- In consultation with the Human Resources and the Office of General Counsel, develop disciplinary measures for noncompliance (including the failure to prevent, detect, or report any noncompliance), appropriate to the nature and extent of the deviation, and assure consistency in the application of disciplinary action.
- Maintain and supervise the maintenance of Compliance Program records in accordance with the Compliance Policies and as set forth in Compliance Policy **12.0 Compliance Document Retention.**

## **II. REPORTING RESPONSIBILITIES**

The Chief Compliance Officer will be considered a member of UHS Management and will report to the President of UHS. The Chief Compliance Officer shall have direct access to the UHS Board of Directors and will make regular reports to the Audit Committee of the Board on the status of the UHS Compliance Program.

- The Chief Compliance Officer will develop a yearly audit work plan, including risk assessment results and HHS/OIG work plan review. The Chief Compliance Officer will initiate compliance audits on a least an annual basis or more often as needed to identify problems deemed high-risk for compliance or address other significant compliance issues as they arise.

- Audit reports and corrective action plans will be presented to the UHS Compliance Committee in a clear and consistent format.
- The Chief Compliance Officer will evaluate the audit work plan annually and make revisions as necessary.
- The Chief Compliance Officer will also oversee and supervise the Compliance Program-related actions and activities of Division Compliance Officers, who will oversee and supervise the Compliance Program-related actions and activities of the Facility Compliance Officers. With the approval of the UHS President, the Chief Compliance Officer may also function as a Division Compliance Officer.

### **III. EXTENDED ABSENCE OR VACANCY OF UHS CHIEF COMPLIANCE OFFICER**

In the event of an extended absence or vacancy of the Chief Compliance Officer, the UHS General Counsel will serve an interim Chief Compliance Officer or designate an interim Chief Compliance Officer to serve in the role.

**Effective Date: 10-21-2010**

**Implementation Date: 10-21-2010**

**Reviewed and Approved by:**

**UHS Compliance Committee**