

COMPLIANCE 3.1 FACILITY COMPLIANCE COMMITTEE

Scope: All subsidiaries of Universal Health Services, Inc.

Purpose: Establish the duties and responsibilities of the Facility Compliance Committee.

Policy: The Facility Compliance Program oversight will be provided by the Facility Compliance Committee and the Facility Compliance Officer. The Compliance Committee and Compliance Officer are vested with the authority to discharge their oversight responsibility as hereafter described:

Facility Compliance Committee Composition

The Compliance Committee shall be composed of at least the following individuals:

- Facility Compliance Officer
- Facility Chief Executive Officer
- Facility Chief Financial Officer
- Facility Director of Nursing
- Facility Human Resources Director
- Facility Privacy Officer
- Facility Security Officer (IS Director)

Other individuals may be invited to join the committee or participate in Compliance Committee meetings as determined by the Compliance Committee or Compliance Officer. Examples include but are not limited to the Chief Operating Officer, Chief Medical Officer, and Associate Administrator. The Facility Compliance Officer shall be the Chair of the Compliance Committee. In the absence of a Facility CEO or his/her designee shall serve as interim Chair of the Compliance Committee and assume all duties and responsibilities of the Facility Compliance Officer.

Purpose of the Facility Compliance Committee

The purpose of the Compliance Committee is to oversee the implementation and operation of the Compliance Program. The Compliance Committee will review reports and recommendation of the Compliance Officer regarding Compliance Program activities, including data regarding compliance generated through audit, monitoring, and individual reporting. Based on these reports, the Compliance Committee will make recommendations regarding the effectiveness of the Compliance Program. The Facility Compliance Officer will consult with the UHS Chief Compliance Officer on policies and procedures, training, new initiatives, investigations, and other pertinent matters to the Compliance Program.

Duties of the Facility Compliance Committee

The duties of the Compliance Committee shall include, but are not limited to:

1. Overseeing the implementation and operation of the Compliance Program.
2. Receiving and acting upon reports and recommendations from the Facility Compliance Officer.
3. Evaluating the performance and effectiveness of the Compliance Program and making recommendations accordingly.
4. Reviewing and approving Compliance Policies as well as other documents relating to the Compliance Program.
5. Conduct quarterly meetings to receive reports from the Facility Compliance Officer and review the operations of the Compliance Program.

Compliance Committee Member Responsibilities

The responsibilities of the Compliance Committee members include the following:

1. Compliance Committee members are expected to demonstrate full commitment to the Compliance Program.
2. Compliance Committee members are expected to be knowledgeable about the Compliance Program and all Compliance Policies.
3. Compliance Committee members are expected to regularly attend the scheduled Compliance Committee meetings and constructively participate.

Role of the Facility Compliance Officer

The Facility Compliance Officer is responsible for the implementation, administration, and oversight of the Compliance Program. The Facility Compliance will work closely and consult with the UHS Chief Compliance Officer on all matters related to the Compliance Program. As such, the Facility Compliance Officer shall, pursuant to its role as Chair of the Compliance Committee:

1. Provide assistance at the facility level with other Compliance Program matters and initiatives as directed by the Chief Compliance Officer and/or Division Compliance Officer.
2. Develop a yearly audit work plan.
3. Develop, coordinate and oversee other audit procedures for the purpose of monitoring and detecting misconduct, noncompliance or failure to follow UHS or facility policies and procedures.
4. Prepare an agenda for Compliance Committee Meetings, which may include reviews of previous meetings and matters of new business to be addressed.
5. Prepare and present updates regarding regulatory issues, reports on audit activity and findings, and other matters pertaining to the activities and effectiveness of the Compliance Program.
6. Prepare minutes from Compliance Committee meetings.
7. Maintain the Compliance Committee agendas and meeting minutes in accordance with the requirements of Compliance Policy **12.0 Compliance Document Retention**.
8. Assume all other necessary duties and responsibilities in accordance with the requirements of Compliance Policy 5.0 **Facility Compliance Officers**.

Implementation Date: 10-12-2017; 10-01-2015

Reviewed and Approved by:

UHS Compliance Committee