

COMPLIANCE 5.0

FACILITY COMPLIANCE OFFICERS

Scope: All subsidiaries of Universal Health Services, Inc., including facilities, Independence Physician Management (IPM), Prominence Health Plan and UHS of Delaware, Inc.

Purpose: Description and reporting responsibility of Facility Compliance Officers.

Policy: All UHS facility subsidiaries (excluding UHS of Delaware) shall designate a Facility Compliance Officer (“FCO”). The FCO will oversee the facility’s compliance program including the implementation of the UHS Compliance Program at their facility. The FCO will be considered a member of management of the facility and will report regarding Compliance Program-related matters to the Chief Executive Officer of the facility, the Division Compliance Officer and UHS Chief Compliance Officer. The FCO will report on Compliance Program-related matters to the Board of Governors of the facility or its equivalent on an annual basis, at least, or more frequently as needed.

In coordination with the Chief Compliance Officer and Division Compliance Officer, the FCOs shall have the following duties and responsibilities:

- Coordinate resources to assure proper implementation and ongoing effectiveness of the Compliance Program at the facility.
- Organize and maintain facility compliance policies and procedures.
- Assure that the facility compliance program effectively prevents and/or detects violations of law, regulations, UHS or facility policies, the Code of Conduct and the Compliance Manual.
- Conduct meetings of the facility compliance committee to review policies, new initiatives, quarterly reporting (e.g., hotline calls, investigations, audits, etc.), and other items central to the compliance program.
- At the direction of the Chief Compliance Officer and/or Division Compliance Officer, conduct compliance education/training programs (e.g. New Employee Orientation) for facility employees and other related persons working with the facility.
- At the direction of the Chief Compliance Officer and/or Division Compliance Officer, conduct and/or provide assistance with investigations including, when requested, conducting or participating in the investigation and/or review of compliance-related reports to the UHS Compliance Hotline and Web Reporting program involving the facility, including the oversight of resolution to any investigations which may involve disciplinary measure against facility employees for instances of noncompliance.

These activities will be done in accordance with Compliance Policy **8.0 Process for Handling the UHS Compliance Hotline and Web Reporting Program.**

- Work with the Chief Compliance Officer and/or Division Compliance Officer in developing and implementing corrective action plans and compliance remediation plans in accordance with Compliance Policy **10.0 Compliance Corrective Action** and Compliance Policy **11.0 Compliance Remediation Plans.**
- Audit physician/health care provider arrangements to assure consistency with contract terms.
- Develop, coordinate and oversee other audit procedures for the purpose of monitoring and detecting misconduct, noncompliance or failure to follow UHS or facility policies.
- Develop a yearly audit work plan.
- 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.
- Maintain facility records relating to the Compliance Program as set forth in the UHS Compliance Policies, including Compliance Policy **12.0 Compliance Document Retention.**

Revision Dates:

7-27-2020; 10-12-2017; 10-01-2015; 10-26-2012

Implementation Date: 10-21-2010

Reviewed and Approved by:

UHS Compliance Committee