



POLICY TITLE: Duties of Corporate Assistant Vice President of Compliance

Responsible Department: Audit and Compliance

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SUMMARY & PURPOSE:

To delineate the authority, duties and responsibilities of the Corporate Assistant Vice President (AVP) of Compliance.

POLICY:

The Corporate AVP of Compliance is a full-time position. The Corporate AVP of Compliance devotes his/her full professional time to carrying out the duties and responsibilities of the Corporate AVP of Compliance under the Corporate Compliance Program.

At the direction and under the supervision of the Corporate Vice President and Chief Compliance Officer, the Corporate AVP of Compliance administers the Corporate Compliance Program in accordance with Program standards and procedures.

SCOPE/APPLICABILITY:

This policy applies to Corporate Assistant Vice President of Compliance.

PROCEDURES TO ENSURE COMPLIANCE:

The Corporate AVP of Compliance is appointed by the Corporate Vice President and Chief Compliance Officer, who also performs his/her annual evaluations.

Responsibilities of the Corporate AVP of Compliance include:

1. Develops and provides suitable periodic training programs for functional groups within the organization so as to enhance the likelihood that employees will be deterred from misconduct and to increase understanding of the ethical standards to which the organization's employees are expected to conform;
2. Develops policies and procedures appropriate for the Corporate Compliance Program on an ongoing basis;

All references to Policies must go to the BHSF Master Copy on the BHSF Intranet; do not rely on other versions / copies of the Policy.

3. Conducts periodically, on his/her own initiative, reviews of divisions, departments or offices of the organization to ensure that they are in compliance with the Program;
4. Maintains a compliance hotline for the receipt of complaints;
5. Monitors the compliance hotline and investigates and documents actions taken to resolve complaints received via the compliance hotline;
6. Informs the Corporate Vice President and Chief Compliance Officer, immediately upon receipt of a complaint that appears to include an allegation of criminal conduct;
7. Reports all activities undertaken with respect to the Program to the Corporate Vice President and Chief Compliance Officer, at least monthly, including the nature, status and actions taken with respect to complaints for the month;
8. Investigates, with the assistance of others, when so directed by the Corporate Vice President and Chief Compliance Officer all complaints of suspected wrongdoing;
9. Performs his/her responsibilities on a confidential basis so as to minimize the risk that an employee feels any threat of retribution in coming forward with reports of wrongdoing;
10. Develops and implements, at the direction of the Corporate Vice President and Chief Compliance Officer, any programs, systems or processes needed to improve or revise the Program;
11. Establishes and maintains documentation of activities undertaken by the organization to implement, monitor and administer the Program;
12. Provides consulting services to departments throughout the organization in regard to topics related to the Code of Ethics;
13. Interacts proactively with all departments throughout the organization to provide guidance and support as needed in relation to compliance with the Program;
14. Such other actions as directed by the Corporate Vice President and Chief Compliance Officer.

SUPPORTING/REFERENCE DOCUMENTATION:

- United States Federal Sentencing Guidelines
- The Office of Inspector General Compliance Program Guidance for Hospitals
- The Office of Inspector General Supplemental Compliance Program Guidance for Hospitals

RELATED POLICIES, PROCEDURES, AND ASSOCIATED FORMS:

- BHSF Administrative Policy: 801 Department Responsibilities and Charter – Audit and Compliance
- BHSF Administrative Policy: 819 Code of Ethics – Audit and Compliance

ENFORCEMENT & SANCTIONS:

Enforcement of the policy is the responsibility of the Audit and Compliance Department.