



**POLICY TITLE:** Compliance Exit Interviews

**Responsible Department:** Audit and Compliance

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## **SUMMARY & PURPOSE:**

This policy outlines the parameters for compliance exit interviews.

## **POLICY:**

The Audit and Compliance Department conducts exit interviews for 'at risk' employees as a resource for identifying potential violations. 'At risk' employees are defined as management or employees who are significantly involved in the internal controls (including regulatory compliance) of the organization or who have been suspected of allegedly committing violations of the Code of Ethics. The compliance exit interview is not intended to replace the normal separation process carried out by Human Resources.

## **SCOPE/APPLICABILITY:**

All individuals whose employment status is terminated, either voluntarily or involuntarily, who meet the parameters for being subject to compliance exit interviews.

## **PROCEDURES TO ENSURE COMPLIANCE:**

1. Upon notification from Human Resources or senior management, the Corporate Vice President and Chief Compliance Officer, or his/her designee, will conduct an exit interview of the 'at risk' employee(s).
2. The compliance exit interview questionnaire should be used as a guide during the interview process.
3. On occasion, an independent party, usually a representative from Human Resources, will be a witness to the discussions that take place during the interview. Results of the interview(s) will be recorded by this independent party.
4. The extent of the potential exposure/risk due to any information received during the interview will be analyzed by the Corporate Vice President and Chief Compliance Officer.

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.

5. The Corporate Vice President and Chief Compliance Officer will refer to management any issues identified which is more appropriately resolved by management.
6. If warranted, the Corporate Vice President and Chief Compliance Officer will recommend a full investigation (see BHSF Policy 807 *Compliance Audits and Investigations* for further discussion regarding compliance audits and investigations).

**SUPPORTING/REFERENCE DOCUMENTATION:**

- United States Federal Sentencing Guidelines
- Office of the Inspector General Compliance Program Guidance for Hospitals
- Office of the Inspector General Supplemental Compliance Program Guidance for Hospitals
- International Standards for the Professional Practice of Internal Auditing (Standards)

**RELATED POLICIES, PROCEDURES, AND ASSOCIATED FORMS:**

- BHSF Administrative Policy: 801 Department Responsibilities and Charter Policy – Audit and Compliance
- BHSF Administrative Policy: 807 Compliance Audits and Investigations Policy – Audit and Compliance

**ENFORCEMENT & SANCTIONS:**

Enforcement of this policy is the responsibility of the Audit and Compliance Department working in conjunction with the Human Resource Department.