

University of Louisville Hospital		POLICY/PROCEDURE	
Subject: VP COMPLIANCE & ETHICS DUTIES/RESPONSIBILITIES		Policy No. 859-0311	Page: 1 of 2
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Vice President of Compliance & Ethics Duties and Responsibilities

Purpose

The University of Louisville Hospital (ULH)/James Graham Brown Cancer Center (BCC) is committed to the operation of an effective corporate compliance and ethics program. Therefore, the ULH/BCC established the position of Vice President of Compliance & Ethics to serve as the focal point for compliance activities and be responsible for oversight of the development, implementation, and daily operation of the compliance program.

Policy

1. The Vice President of Compliance & Ethics' primary responsibility is the implementation and effective operation of the compliance program. The Vice President of Compliance & Ethics shall have direct access to the CEO and to the Board of Directors.

Procedures

The Vice President of Compliance & Ethics shall be responsible for the following:

1. Coordinate development and implementation of the Corporate Compliance & Ethics Program
2. Establish and chair the Corporate Compliance & Ethics Committee, including the development of relevant reports and other information directed by the committee.
3. Develop and maintain the Code of Conduct as well as other related policies, rules, and procedures.
4. Establish employee reporting channels, including, but not limited to, an anonymous telephone reporting system (compliance hotline), which employees may use to report problems without fear of retaliation.
Note: Employees should be able to report any alleged or actual noncompliance in good faith and without fear of retaliation. The hospital's reporting system should be adequately publicized.
5. Implement corporate-wide training and communication programs to ensure that all employees and affiliated parties are educated on and understand the Code of Conduct and the corporate compliance program, as well as the hospital's commitment to comply with all laws, regulations, policies and procedures, including the prevention and detection of fraud, waste and abuse, (see the Code of Conduct) and other issues deemed necessary.

6. Monitor the corporate-wide compliance plan for periodic updates when needed and oversee follow-up and resolution to issues generated by the compliance program, including the development of corrective action plans, as needed.
7. Delegate responsibility to conduct appropriate compliance investigations (e.g. legal, human resources, and internal audit) to ensure prompt follow-up and resolution.
8. Coordinate and conduct inquiries and/or investigations when deemed necessary.
9. Establish and oversee internal and external audit controls and measurements to detect and monitor any misconduct or noncompliance and to ensure correct processes are identified and established.
10. Provide input and/or direction to Human Resources policies and procedures to ensure that inappropriate conduct is discouraged and that conformity with the compliance program is included in the performance evaluation process for all employees; furthermore ensure there are consistent mechanisms for disciplining noncompliance, including the failure to prevent, detect, or report noncompliance, in accordance with the hospital's progressive discipline policy.
11. Maintain a working knowledge of relevant issues, laws, and regulations through periodicals, seminars, training programs, and peer contacts.
12. Report quarterly to the appropriate committee on the status of the Corporate Compliance & Ethics Program.
13. Respond appropriately if a violation is uncovered, including a direct report to the Board of Directors or external agency if deemed necessary.