

TITLE: Ethics & Compliance Officer and Committee	POLICY DESCRIPTION: Requirements to Establish and Maintain an Ethics and Compliance Officer and Committee
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EFFECTIVE DATE: September 1, 2005	REFERENCE NUMBER: HPG.013

<p>SCOPE: HealthTrust Purchasing Group (“HPG”)</p>
<p>PURPOSE: To ensure that HPG has an Ethics and Compliance Officer (ECO) and to ensure HPG establishes and maintains an HPG Ethics and Compliance Committee for administration of the HPG Ethics and Compliance Program.</p>
<p>POLICY:</p> <ol style="list-style-type: none"> 1. HPG must have an ECO to implement and oversee the HPG Ethics and Compliance Program and HPG’s compliance with applicable laws and regulations. 2. HPG must establish an HPG Ethics and Compliance Committee (HECC) to assist with the implementation and administration of the Ethics and Compliance Program.
<p>DEFINITIONS:</p> <p>HPG, is a “group purchasing organization” that is structured to comply with the requirements of the “safe harbor” regulations regarding payments to group purchasing organizations set forth in 42 C.F.R. §1001.952(j) and that maintains agreements with vendors for purchasing on a national basis various products, supplies, materials, dietary products, equipment and services used by hospitals and other healthcare facilities as part of a group purchasing program.</p>
<p>PROCEDURE:</p> <ol style="list-style-type: none"> 1. The HPG President shall either assume the duties of ECO or designate an appropriate individual as identified below, to serve as the ECO. 2. The ECO must be a Vice President or a full-time ECO. 3. The ECO must implement and oversee HPG’s Ethics and Compliance Program and compliance with applicable laws and regulations. The ECO’s responsibilities for implementation and oversight of the HPG Ethics and Compliance Program include but are not limited to: <ol style="list-style-type: none"> a. communicating compliance standards, b. distributing the Code of Conduct and overseeing related training, c. coordinating and monitoring required compliance training, d. advising HPG Colleagues on ethics and compliance matters, e. conducting and cooperating with investigations, f. ensuring no retaliation for good faith reporting, g. coordinating and supporting corporate monitoring and auditing procedures,

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- h. reviewing internal audit reports and investigative reports,
 - i. identifying trends related to ethics and compliance within HPG,
 - j. coordinating with HPG's clinical ethics committee (if one),
 - k. overseeing HPG compliance with records retention requirements,
 - l. ensuring employee evaluations include an ethics and compliance component,
 - m. submitting reports to the HPG equity owners, as appropriate, and
 - n. coordinating with legal department to be aware of current applicable laws and regulations.
4. HPG Ethics and Compliance Committee (HECC)
- a. The HPG ECO shall establish an HECC. The ECO shall chair the HECC, which should include HPG's Board members and Managing Counsel.
 - b. Each HECC member will:
 - Assist the ECO in implementing the HPG Ethics and Compliance Program, including investigations, training, and administrative requirements;
 - Assist the ECO in ensuring HPG's compliance with the requirements of applicable laws and regulations; and
 - Report compliance concerns to the ECO.
 - c. The HECC will meet as necessary, but at least biannually. HECC meetings should be used to resolve open issues, announce new initiatives, review new rules, regulations, and policies and procedures, develop work plans and assign responsibilities for meeting HPG Ethics and Compliance Program requirements.
5. The ECO's effectiveness in performing his or her duties will be annually assessed. This assessment may include one or more of the following: evaluations, compliance process reviews, and surveys. Proper execution of the ECO duties will be considered for the ECO's performance evaluation.