

**EPIC MANAGEMENT, L.P.
BEAVER MEDICAL GROUP, L.P.
EPIC HEALTH PLAN**

**ADMINISTRATIVE POLICY AND PROCEDURE
COMPLIANCE**

SUBJECT: Compliance Committee	
DRAFTED BY: Sherry Miller, CCO	DATE: 8/17/2020
REVIEWED BY:	DATE:
REVISED BY:	DATE:
APPROVED BY: Compliance Committee	DATE: 8/17/2020
BOARD APPROVAL DATE: N/A	
EFFECTIVE DATE OF POLICY: 9/1/2020	

1. **PURPOSE:** This EPIC Compliance Committee Policy sets forth the structure, authority, and the general and specific responsibilities of EPIC's Compliance Committee.
2. **ATTACHMENTS:** N/A.
3. **DEFINITIONS:** All capitalized terms used but not defined in this Policy shall have the meaning attributed to them in the EPIC Compliance Program Definitions Policy.
4. **POLICY:** The Compliance Committee shall support the Corporate Compliance Officer in fulfilling their responsibilities.
 - a. **Committee Structure**
 - i. The Compliance Committee shall be chaired by the Corporate Compliance Officer.
 - ii. The Compliance Committee shall consist of the Corporate Compliance Officer, at least one (1) physician leader from BMG, and at least one (1) senior executive from each of the following departments:
 - (1) Human Resources,
 - (2) Finance,

- (3) Patient Financial Services,
 - (4) Information Technology,
 - (5) Clinical Support Services,
 - (6) Quality Improvement,
 - (7) Utilization Management,
 - (8) Network Management,
 - (9) Risk Management, and
 - (10) Any other department deemed appropriate by the Corporate Compliance Officer.
- iii. To ensure compliance with the respective bylaws of the Board of Directors of EHP and the Board of Directors of EPIIC Management, Inc., the Compliance Committee must include two (2) directors from the Board of Directors of EHP and two (2) directors from the Board of Directors of EPIIC Management, Inc.
 - iv. Members of the Compliance Committee shall be appointed by the Corporate Compliance Officer with oversight by the Board.
 - v. The Compliance Committee's membership shall be assessed by the Corporate Compliance Officer, in consultation with the Board, on at least an annual basis to ensure that all appropriate departments are represented and that all Board bylaw requirements are met.
- b. Committee Authority**
- i. The Compliance Committee shall have the authority and freedom to report on compliance related matters to the Corporate Compliance Officer, the Board, or EPIC's Chief Executive Officer at any time.
 - ii. The Compliance Committee, under the direction of the Corporate Compliance Officer, shall have the authority to access and review all corporate records and other documents, and interview all Personnel, as necessary.
 - iii. The Compliance Committee, under the direction of the Corporate Compliance Officer, shall also have sufficient

management authority, responsibility, resources, and autonomy to permit the effective performance of its duties outlined below.

c. Committee Responsibilities

- i. The Compliance Committee's responsibilities include assisting the Corporate Compliance Officer with:
 - (1) Analyzing the industry environment, legal requirements with which EPIC must comply, and specific risk areas;
 - (2) Developing and updating EPIC Compliance Program Policies designed to ensure compliance with Federal Health Care Program requirements, applicable law, and the CIA;
 - (3) Recommending and monitoring, in conjunction with relevant departments, internal controls to help prevent and/or detect violations of the law and/or EPIC's Compliance Program Policies and Code of Conduct;
 - (4) Developing (in consultation with the Compliance Committee, the Board, and Health Care Counsel), implementing, and overseeing a centralized annual risk assessment and internal review process to identify and address risks associated with EPIC's participation in Federal Health Care Programs;
 - (5) Ensuring communication of the Compliance Program is disseminated to all Personnel;
 - (6) Developing a system to solicit, evaluate, and respond to Compliance Concerns;
 - (7) Overseeing monitoring of internal and external audits and compliance investigations, and implementation of corrective and preventative action;
 - (8) Evaluating the resources assigned to the Compliance Program to assess program adequacy;
 - (9) Reviewing and overseeing compliance education and training, including the development (in consultation with the Corporate Compliance Officer, the Board, and Health Care Counsel) of a Training Plan to ensure that appropriate compliance training is

provided, on at least an annual basis, to all Personnel;

- (10) Monitoring EPIC's compliance with the requirements of the CIA, including any reporting obligations thereunder; and
- (11) Taking appropriate actions to develop and foster a culture of compliance in which Compliance Concerns are promptly raised, addressed, and resolved at the appropriate levels.

d. Member Responsibilities:

- i. Members are expected to regularly attend scheduled and called meetings; provided, however, that absence may be excused by the Corporate Compliance Officer for good cause.
- ii. Chronic absenteeism (absence from two consecutive meetings or three meetings per year) without good cause shall be reported to the member's immediate supervisor who may use the information in the absentee's annual performance evaluation.
- iii. Members shall not disclose any sensitive information regarding individuals or EPIC, or other information identified as confidential and proprietary, unless directed by legal counsel.

e. Meeting Requirements

- i. The Compliance Committee shall meet at least quarterly for at least one (1) hour, or more frequently as the Committee may determine. With the exception of meetings called on an ad hoc basis, the meeting schedule for the Compliance Committee will be determined in advance on an annual basis.
- ii. The Compliance Committee may not conduct its business unless there is a quorum present and the Corporate Compliance Officer is present. A quorum shall consist of half (rounded up to the nearest whole number) of the Compliance Committee's members (including the Corporate Compliance Officer).
- iii. All decisions by the Compliance Committee shall be adopted by a majority of votes of the members present at the

meeting; provided, however, that in the event of a tie among the votes, the decision shall be determined by the vote of the Chair of the Compliance Committee (i.e., the Corporate Compliance Officer).

- iv. The Compliance Committee shall keep written minutes of its meetings, which minutes shall be maintained as part of EPIC's Compliance Program files, in compliance with the EPIC Compliance Program Records Retention Policy.