

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

**ADMINISTRATIVE POLICY AND PROCEDURE  
COMPLIANCE**

|  |                        |
|--|------------------------|
| <b>SUBJECT:</b> Corporate Compliance Officer |                        |
| <b>DRAFTED BY:</b> Sherry Miller, CCO        | <b>DATE:</b> 8/17/2020 |
| <b>REVIEWED BY:</b>                          | <b>DATE:</b>           |
| <b>REVISED BY:</b>                           | <b>DATE:</b>           |
| <b>APPROVED BY:</b> Compliance Committee     | <b>DATE:</b> 8/17/2020 |
| <b>BOARD APPROVAL DATE:</b> N/A              |                        |
| <b>EFFECTIVE DATE OF POLICY:</b> 9/1/2020    |                        |

1. **PURPOSE:** This EPIC Corporate Compliance Officer Policy sets forth the authority and general and specific responsibilities of EPIC's Corporate Compliance Officer.
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 Corporate Compliance Officer is responsible for developing, implementing, and monitoring EPIC's Compliance Program.
  - a. **Qualifications of Corporate Compliance Officer**
    - i. The Corporate Compliance Officer shall be an employee and a member of senior management of EPIC.
    - ii. The Corporate Compliance Officer shall have credentials and experience appropriate for understanding the mission and operations of EPIC and for executing the duties and responsibilities set forth in this Policy.
    - iii. The Corporate Compliance Officer shall demonstrate high integrity, good judgment, assertiveness, an approachable demeanor and elicit respect and trust from the Board and Personnel.

- iv. The Corporate Compliance Officer shall not be either the General Counsel or Chief Financial Officer.
- v. Although the Corporate Compliance Officer may be a licensed attorney, they shall not have any responsibilities that involve acting in any capacity as legal counsel or supervising legal counsel functions for EPIC.
- vi. Any noncompliance job responsibilities of the Corporate Compliance Officer shall be limited in scope, so as not to interfere with the Corporate Compliance Officer's ability to perform the duties outlined in this Policy.

**b. Authority of Corporate Compliance Officer**

- i. The Corporate Compliance Officer shall be appointed by EPIC's Chief Executive Officer, subject to the approval of the Board.
- ii. The Corporate Compliance Officer shall report directly to EPIC's Chief Executive Officer, and shall not be subordinate to the General Counsel or Chief Financial Officer.
- iii. The Corporate Compliance Officer shall have the authority and freedom to report to the Board, EPIC's Chief Executive Officer, and the Compliance Committee on compliance matters at any time.
- iv. The Corporate Compliance Officer shall have the authority to access and review all EPIC records and documents and interview all EPIC Personnel, including EPIC senior management, as necessary to discharge their duties and responsibilities.
- v. The Corporate Compliance Officer shall also have sufficient management authority, responsibility, resources, and autonomy to permit the effective performance of their duties as outlined in this Policy.
- vi. The Corporate Compliance Officer, in coordination with or through EPIC's Chief Executive Officer, shall have the authority to consult with Health Care Counsel, and to engage other qualified outside legal counsel and consultants, to assist them in achieving the objectives of the Compliance Program.

**c. Corporate Compliance Officer Responsibilities**

- i. The Corporate Compliance Officer's responsibilities shall include:
  - (1) Developing, implementing, and updating, in consultation with the Compliance Committee, Compliance Program Policies

designed to ensure compliance with Federal Health Care Program requirements, applicable law, and the CIA;

- (2) Developing, in consultation with the Compliance Committee, the Board, and Health Care Counsel, a centralized annual risk assessment and internal review process to identify and address risks associated with EPIC's participation in Federal Health Care Programs;
- (3) Appointing members of the Compliance Committee in accordance with EPIC's Compliance Committee Policy and, in consultation with the Board, assessing the Compliance Committee's membership on an annual basis to ensure that all appropriate departments are represented;
- (4) Chairing the Compliance Committee, and overseeing the Compliance Committee's meetings, day-to-day operations, and progress in implementing EPIC's centralized annual risk assessment and internal review process;
- (5) Reporting on a regular basis (at least quarterly) in person to the Board regarding compliance matters and the operation of EPIC's Compliance Program;
- (6) Ensuring communication of the Compliance Program is disseminated to all Personnel;
- (7) Monitoring the day-to-day compliance activities engaged in by EPIC;
- (8) Monitoring EPIC's compliance with the requirements of the CIA, including any reporting obligations thereunder;
- (9) Monitoring, in consultation with the Compliance Committee, internal and external audits and compliance investigations, and implementation of corrective and preventative action;
- (10) Developing, in consultation with the Compliance Committee the Board, and Health Care Counsel, a Training Plan to ensure that appropriate compliance training education is provided, on at least an annual basis, to all Personnel;
- (11) Reviewing and overseeing compliance training and education in accordance with the Training Plan;
- (12) Taking appropriate steps, including ensuring that relevant governmental databases are checked, to confirm that no

current or prospective Personnel are or have been excluded, suspended, or debarred;

- (13) Establishing and appropriately publicizing a Disclosure Program to allow and encourage Personnel to report Compliance Concerns and ask questions about EPIC's Compliance Program Policies without fear of retaliation or retribution;
- (14) Ensuring that Compliance Concerns generated through the Disclosure Program or otherwise are documented and addressed in a prompt and appropriate manner;
- (15) Revising EPIC's Compliance Program, in consultation with the Compliance Committee, the Board, and Health Care Counsel, as appropriate, to address existing and new risk areas and to incorporate any changes in applicable law or Federal Health Care Program requirements; and
- (16) Ensuring, in consultation with Human Resources, there are procedures in place to discipline non-compliance as appropriate given the nature and extent of the deviation, and overseeing and documenting any disciplinary action.