

Sutter Health System

Executive Compliance Committee Charter

Purpose and Role

The Committee provides executive-level direction and guidance to the Sutter Health Ethics and Compliance Program and assists the VP, Chief Ethics & Compliance Officer (“Chief Compliance Officer”) in overseeing the Program. In its oversight role the committee shall, with the Chief Compliance Officer,

- take actions necessary to facilitate the development, implementation and operation of an effective compliance and ethics program;
- promote an organizational culture that encourages law abiding and ethical conduct; and
- consider and resolve issues of interpretation and application regarding the compliance and ethics program.

Membership

Membership on the Committee shall be appointed from time to time by the Chief Executive Officer and shall include the following individuals:

- Regional Presidents (Representative)
- SVP, General Counsel
- Comptroller
- Human Resources Executive
- VP, Internal Audit
- VP, Risk Management
- Reimbursement/Revenue Cycle Executive
- Executive Physician Representative
- Chief Compliance Officer
- Other Individuals as the CEO May Appoint from Time to Time

In addition to these committee members, the following individuals shall attend and participate in Committee meetings as Committee staff:

- Regional Counsel
- Deputy Counsel for Stark/AKS
- Deputy Counsel for Reimbursement
- Regional Compliance Officers
- Privacy Officer
- Security Officer
- Director of Coding Compliance
- Executive Director Compliance Training & Program Effectiveness
- Director of Compliance Audit

The Chief Compliance Officer shall serve as chair of the Committee, and shall be responsible for establishing agendas for committee meetings.

Meetings

The Committee shall meet four times per year or more frequently at the request of the Chief Compliance Officer. Minutes of the discussions and actions taken by the Committee shall be reflected in recorded minutes which shall be maintained by the Compliance Office. Attendance by members and staff of the Committee shall be recorded in the minutes. A majority of the members of the Committee shall constitute a quorum for purposes of taking action.

Responsibilities

- Provide advice and guidance to the Chief Compliance Officer on the design and operation of the ethics and compliance program
- Approve the annual compliance workplan, monitor progress and provide executive support as needed to facilitate completion of activities outlined on the workplan
- Allocate resources, when necessary, to mitigate activities determined to be a high compliance risk
- Receive and review results of all completed compliance auditing and monitoring activities
- Receive and review a summary report of confidential reporting mechanism activities
- Review reports of the overall effectiveness of the compliance program and make recommendations for improvements to the compliance program
- Maintain accountability for compliance activities within their areas of responsibility and support activities of compliance department staff in the implementation and operation of the compliance program.
- Pursuant to this Charter and the Sutter Health System Policy on Policies, the System Management Team also delegates authority to this Committee to develop and adopt (in concert with the System Policy & Procedure Committee) System Policies designed to mitigate compliance risks.

Revised: 10/2/2012

SMT Approval: 11/27/2012