

COMPLIANCE 4.0

DIVISION COMPLIANCE OFFICERS

Scope: All subsidiaries of Universal Health Services, Inc., including Acute and Behavioral Division facilities, Independence Physician Management (IPM), Prominence Health Plan and UHS of Delaware, Inc.

Purpose: Description and reporting responsibility of Division Compliance Officers.

Policy: The Acute Division, the Behavioral Division, IPM and Prominence Health Plan will each have a Division Compliance Officer who will coordinate with the UHS Chief Compliance Officer and individual Facility Compliance Officers (“FCO”) in the respective divisions to implement the UHS Compliance Program. The Division Compliance Officer will report regarding Compliance Program-related matters to the Chief Compliance Officer. The FCOs will report regarding Compliance Program-related matters to their respective Division Compliance Officer. With the approval of the UHS President, the Chief Compliance Officer may also function as a Division Compliance Officer.

In coordination with the Chief Compliance Officer and the FCOs in their division, the Division Compliance Officers shall have the following duties and responsibilities:

- Coordinate resources to assure proper implementation and ongoing effectiveness of the Compliance Program at the facilities in the division.
- Provide oversight to FCOs to facilitate consistency and effectiveness of the Compliance Program in each of the facilities in the division.
- Oversee FCO participation in investigations of matters related to health care compliance, audit activities, corrective action plans, and compliance remediation plans in accordance with Compliance Policy 9.0 Conducting Internal Investigations, Compliance Policy 10.0 Compliance Corrective Action, Compliance Policy 11.0 Compliance Remediation Plans, and Compliance Policy 12.0 Compliance Document Retention.
- Coordinate with the Chief Compliance Officer, the FCOs, the applicable Human Resources professionals, and if necessary the UHS Legal Department, to handle disciplinary measures for noncompliance (including the failure to prevent, detect, or report any noncompliance), to confirm that the disciplinary actions are appropriate to the nature and extent of the deviation, and consistent in application across facilities in the division.
- Provide the Chief Compliance Officer with information on a regular basis regarding Compliance Program activities being carried out in the division.

- Report significant compliance issues promptly to the Chief Compliance Officer and coordinate resources to assure an effective response in accordance with the Compliance Program policies and procedures.
- Oversee the implementation by FCOs of the educational activities undertaken pursuant to the Compliance Program.
- Provide assistance at the division and facility levels with other Compliance Program matters and initiatives as directed by the Chief Compliance Officer.

Revision Dates:

7-27-2020; 10-12-2017; 10-01-2015; 10-26-2012

Implementation Date: 10-21-2010

Reviewed and Approved by:

UHS Compliance Committee