



University of Utah Health Sciences Compliance Plan

University of Utah Health Sciences (UUHS) is committed to serving the people of Utah and beyond by continually improving individual and community health and quality of life. UUHS meets this commitment through excellence in patient care, education, and research. Operating in a manner consistent with ethical and legal expectations is critical to the success of UUHS. The UUHS Compliance Plan is designed to assist UUHS in its efforts to meet these expectations. UUHS Compliance Services provides oversight of UUHS activities through methods designed to prevent, detect, and correct non-compliant and unethical conduct.

All individuals conducting UUHS business share responsibility for operating in a manner that meets our organization's high standards. UUHS expects all individuals to meet professional, ethical, and legal standards associated with their respective roles.

This Compliance Plan is intended to provide a high-level description of the manner in which UUHS Compliance Services provides oversight. It is not intended to provide detailed policies and procedures. UUHS has and will continue to promulgate compliance-related policies and procedures applicable to UUHS. UUHS units are encouraged to consider and address compliance issues in unit-specific policies and procedures.

The Seven Elements of Effective Compliance Programs, published by the Office of the Inspector General for the federal Department of Health and Human Services, serves as the foundation of the UUHS Compliance Plan. UUHS has implemented the seven elements as follows:

1. UUHS maintains written standards of conduct outlining the expectation of ethical and compliant behavior. These standards of conduct also address consequences of non-compliance.
 - University of Utah Ethical Standards & Code of Conduct website:
<https://www.hr.utah.edu/ethicalstandards/index.php>
2. UUHS has appointed a Chief Compliance Officer who reports directly to senior UUHS leadership. UUHS also maintains an executive level compliance oversight committee consisting of senior leaders.
 - The Chief Compliance Officer is responsible for the creation, implementation, and operation of the UUHS Compliance Program. The Chief Compliance Officer directs investigations, training plans, policy creation, and the provision of advisory opinions.
 - The Compliance Oversight Committee (COC) is a standing UUHS committee comprised of senior UUHS leadership. The COC assists the Chief Compliance

Officer in his/her duties. In addition to the COC, the Chief Compliance Officer may, in his/her discretion, form such other committees or working groups as may be necessary to further UUHS compliance efforts.

3. UUHS regularly provides compliance-related education and guidance and trains personnel to meet their individual compliance responsibilities.
4. UUHS personnel are encouraged to contact and work with UUHS Compliance Services. UUHS maintains an Ethics and Compliance Hotline that allows individuals to report complaints or concerns related to compliance matters. Reports may be anonymous. Retaliating against an individual for making a report is prohibited by UUHS policy.
 - University of Utah Ethics & Compliance Hotline:
<https://www.hr.utah.edu/ethicalstandards/compliance.php>
5. UUHS regularly audits and utilizes evaluation techniques to monitor compliance and assist in the remediation of identified problem areas.
6. UUHS appropriately responds to allegations of improper or illegal activities. UUHS compliance personnel work cooperatively with University stakeholders to conduct investigations and advise supervisors and Human Resources with respect to disciplinary actions resulting from identified non-compliance.
7. UUHS employs audit and other methodologies designed to identify systemic problems. UUHS investigates identified issues and utilizes an internal corrective action plan process to address such issues.

The continued success of UUHS depends on the personal and professional integrity of the individuals working to further the mission of UUHS. The UUHS Compliance Plan and the policies and procedures promulgated in support of the UUHS Compliance Plan are designed to help personnel reach ethical and legally compliant solutions to the problems they face.