



**COMMUNITY
HEALTH NETWORK**
of Connecticut

POLICY AND PROCEDURES

SUBJECT: Reporting to the Finance and Operations Committee

P&P #	DATE ISSUED	DATE REVIEWED	DATE REVISED
CMPL013	05/04/04		
REPLACES POLICY #	DATE RETIRED		

Date Director, Government Affairs & Compliance	Date President & Chief Executive Officer
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POLICY:

The Director of Government Affairs & Compliance (herein referred to as “Compliance Officer”) shall meet quarterly (no less frequently than annually) with Community Health Network Of Connecticut’s (CHNCT) Finance and Operations Committee of the Board of Directors to provide reports on various activities of and pertinent information regarding CHNCT’s Compliance and Ethics program.

PROCEDURE:

- I.** CHNCT’s Board of Directors is responsible for overseeing the activities of the company. The Finance and Operations Committee of the Board is charged with making recommendations for the consideration of the Board of Directors with respect to compliance with CHNCT’s legal and regulatory requirements, as stated in the Amended and Restated Bylaws of CHNCT, Inc. adopted as of September 4, 2003. As such, this Committee has the responsibility for oversight of CHNCT’s Compliance and Ethics program.
- II.** CHNCT’s Compliance Officer will meet with the Finance and Operations Committee on a quarterly basis to provide a compliance update, which may include, but not be limited to the following:
 - a. High-level overview of CHNCT’s compliance program activities;
 - b. Summary of the compliance issues reported for the quarter (type and number of issues);
 - c. Summary of auditing and monitoring findings; and
 - d. Any compliance-related topics that may require guidance from the Committee.
- III.** The Finance and Operations Committee will be responsible for certain actions regarding CHNCT’s Compliance and Ethics program, which will include, but not be limited to, approving CHNCT’s compliance audit plan annually (or any major revisions as necessary).
- IV.** The Finance and Operations Committee members will be responsible for providing any relevant information they receive from the Compliance Officer to the full Board of Directors. CHNCT’s Compliance Officer shall arrange to meet with the full Board of Directors upon their request in order to provide additional information on a particular issue/ subject.

REFERENCES:

- I.** Amended and Restated Bylaws of CHNCT, Inc. adopted as of September 4, 2003: Article IV, Section 5: Audit Committee