

BOARD OF DIRECTORS' 2016 COMPLIANCE RESOLUTION

WHEREAS, Northern Inyo Healthcare District (hereinafter "NIHD" or "the District") has a long tradition of integrity and responsible conduct, as well as a long history of service to its community; and

WHEREAS, NIHD is committed to conducting itself with the highest integrity and in compliance with all applicable laws and regulations; and

WHEREAS, NIHD has been in the process of enhancing its efforts to ensure adherence to these principles and wishes to consolidate these efforts into one plan; and

WHEREAS, the NIHD Board of Directors (hereinafter "Board") strongly endorses and recommends that the District have a robust ethics and compliance plan, and voluntary adoption of such a program is considered a best business practice that will serve to enhance the public trust; and

WHEREAS, to assist the Board, medical staff, employees, contractors, and volunteers to understand the requirements of those applicable laws and regulations which apply to the District;

NOW, THEREFORE, BE IT RESOLVED, that it is the policy of NIHD to be a model corporate citizen, to cooperate in government investigations of wrongdoing, to make appropriate voluntary self-disclosures of violations of applicable laws and regulations, as determined by the Chief Executive Officer with the advice of the Compliance Officer and General Counsel, and to remedy any harm caused by such wrongdoing; and

BE IT FURTHER RESOLVED, that the Board of NIHD does approve and adopt the Compliance Program as shown in attachment I; and

BE IT FURTHER RESOLVED, that the Board hereby delegates to the Compliance Officer of the District responsibility for oversight of the Compliance Program; and

BE IT FURTHER RESOLVED, that the Board shall be given at least an annual report by the Compliance Officer on the progress of the Compliance Program; and

BE IT FURTHER RESOLVED, plans for further activities of the Compliance and Business Ethics Committee shall be communicated to the Board; and

BE IT FURTHER RESOLVED, that the Compliance Officer shall have the authority and responsibility to take all appropriate steps deemed reasonably necessary for the establishment of the Compliance Program approved by the Board of Directors thereof, including:

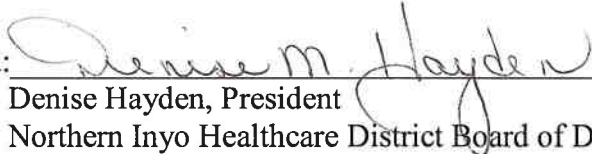
1. Working with a designated Compliance and Business Ethics Committee and all members of District to establish a program that is diligent and meets industry practice, fosters ethical standards, is effective in deterring and detecting violations of applicable law, and regulations, and meets government standards including those set

forth in the United States Sentencing Commission Organizational Sentencing Guidelines Manual; and


2. Delegating to others in District's community responsibility for assisting in the implementation of the Compliance Program; and
3. Providing a report on the Compliance Program to the Board, covering such elements as training, discipline, development of standards and procedures, compliance auditing and monitoring, changes in compliance program personnel, reports of misconduct received through the reporting system, the handling of conflicts of interest, and any governmental investigation that may involve NIHD; and

BE IT FURTHER RESOLVED, the Compliance Officer may meet with an ad hoc committee of the Board, as necessary.

Signed: _____


Denise Hayden, President
Northern Inyo Healthcare District Board of Directors

Attest: _____


M.C. Hubbard, Secretary
Northern Inyo Healthcare District Board of