

**Aurora Health Care, Inc.**

**Research Compliance Program Overview**

**April, 2004**

**PURPOSE:**

It is the goal of the Aurora Health Care, Inc. (Aurora) to consistently and fully comply with all laws, regulations and ethical guidelines pertaining to the conduct of research with Aurora facilities.

**INTRODUCTION:**

Aurora has developed this compliance program to be a comprehensive statement of the responsibilities of all employees regarding the conduct of research by Aurora or within Aurora facilities.

**RESEARCH COMPLIANCE OVERSIGHT COMMITTEE:**

Aurora created the Research Compliance Oversight Committee to guide the development of a research compliance program and documents to define methods regarding the support of the conduct of research and its associated billing within Aurora facilities.

**COMPLIANCE PROGRAM:**

The Research Compliance Program (Program) defines corporate procedures applicable to all affected areas of Aurora and shall be developed and kept current will all applicable laws and regulations. These affected areas shall include the Aurora Department of Clinical Research, Aurora Institutional Review Boards, the operations of the hospitals (specifically the central business office), physician clinics, and such other areas as Aurora shall designate in order to conform to Aurora's Research Compliance Program, as stated above.

The section(s) of the Program applicable to a particular affected area of Aurora shall contain a statement of Purpose for that area and shall define and assign responsibility to the person(s) in a specific position for the implementation of Program requirements. The section(s) shall be an important resource for the employees of each area in order that they may perform their responsibilities in compliance with the Program. (See both Research Compliance Program Policy and Research Billing Compliance Policy.)