

Policy and Procedure	
SUBJECT: Commitment to Comply with all Federal and Applicable State Standards	DEPARTMENT: Regulatory Compliance, Risk Management and Government Affairs
ORIGINAL EFFECTIVE DATE: 02/11	DATE(S) REVIEWED/REVISED: 01/12, 05/12, 03/14, 12/15, 09/16, 12/17, 09/18, 05/19, 04/20, 04/21, 06/21, 06/22, 03/23, 04/24
APPROVED BY: Chief Compliance and Risk Officer	NUMBER: RA 52 PAGE: 1 of 2

SCOPE:

Providence Health Plan and Providence Health Assurance as applicable (referred to individually as “Company” and collectively as “Companies”).

APPLIES TO:

Fully Insured			Self-Insured	Medicare	Medicaid
Individual	Small Group	Large Group			
<input type="checkbox"/> Oregon On Exchange	<input type="checkbox"/> Oregon On Exchange (SHOP)	<input type="checkbox"/> Oregon	<input type="checkbox"/> ASO	<input checked="" type="checkbox"/> Medicare	<input checked="" type="checkbox"/> Medicaid
<input type="checkbox"/> Oregon Off Exchange	<input type="checkbox"/> Oregon Off Exchange (SHOP)	<input type="checkbox"/> Washington	<input type="checkbox"/> PBM		
<input type="checkbox"/> Washington Off Exchange					
<input type="checkbox"/> APPLIES TO ALL ABOVE LINES OF BUSINESS					

POLICY:

Company will comply with all Federal, state, and local laws and regulations. These regulations are applicable to all First Tier, Downstream and Related Entities (FDRs).

PROCEDURE:

All affected operational business areas are notified regarding updates and new guidance released by Federal and State Agencies. The Regulatory Compliance, Risk Management and Government Affairs Department, (referred to as “Compliance”) is responsible for the distribution of all newly released guidance, as well as the training of key contacts within the affected departments.

To ensure that each operational business area continues to comply with the aforementioned guidance Compliance also maintains an effective monitoring and audit program. All caregivers

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and FDRs are expected and required to comply with all Company policies and procedures, the PHP/PHA Standards of Conduct, and the Providence St. Joseph Code of Conduct.

In the instance that any areas of the Companies are found to be deficient in complying with Federal or applicable state standards, Compliance will issue an action plan including recommendations and a scheduled re-audit. When an internal investigation and/or re-audit results in findings of misconduct, Compliance and applicable Company leadership will issue appropriate actions.

Compliance is accountable for the continued monitoring of any Company operational business area(s) with any deficiencies found during the internal auditing process. See policy RA 55 for more information on Companies Internal Monitoring and Audit Program.

REFERENCES:

42 CFR §422.503(b)(4)(vi) and §423.504(b)(4)(vi), Chapter 9 of the Medicare Prescription Drug Manual, Chapter 21 of the Medicare Managed Care Manual and Compliance Program Guidelines, Health Share of Oregon Integrated Delivery System Participation Contract