

<b>Policy and Procedure</b>	
SUBJECT: Compliance Program Policy	DEPARTMENT: <b>Regulatory Compliance, Risk Management and Government Affairs</b>
ORIGINAL EFFECTIVE DATE: <b>05/24</b>	DATE(S) REVIEWED/REVISED:
APPROVED BY: PHP PHA Compliance and Risk Committee	NUMBER: <b>RA 143</b> PAGE: <b>1 of 3</b>

**SCOPE:**

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

**APPLIES TO:**

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

**POLICY:**

In accordance with the CMS guidelines, Federal and State regulations and contractual requirements, Providence Companies have developed and implemented an effective Compliance Program, applicable to delegation agreements. The Compliance Program supports the commitment to comply with all Federal and State standards, including but not limited to, all applicable statutes, regulations, sub-regulatory guidance, and contractual requirements. Company has developed and implemented an effective Compliance Program that demonstrates the Companies commitment to comply with all Commercial, Medicare and Medicaid regulations.

**PROCEDURE:**

- I. The Sr. Director Compliance – Compliance Officer oversees and is responsible for the Compliance Program. The Compliance Officer delegates responsibility for day-to-day tasks required to ensure compliance with all regulatory and contractual requirement to management-level compliance leaders and their caregivers in the Regulatory Compliance, Risk Management and Government Affairs department. That delegation is carried out in a manner consistent with the Compliance Program approved by the PHP PHA Compliance and Risk Committee.
- II. The Sr. Director Compliance – Compliance Officer reports directly to Chief Compliance and Risk Officer. The Chief Compliance and Risk Officer chairs the PHP PHA Compliance and Risk Committee and reports to the governing board.

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III. The Sr. Director Compliance – Compliance Officer is responsible for the daily implementation operational oversight, and ongoing management of the Compliance Program. Specifically, the Sr. Director Compliance – Compliance Officer oversees the following functions:

- Policies and Procedures
- Standards of Conduct
- Compliance Caregivers
- Compliance Oversight
- Vendor Contractor and Delegation Agreements
  - i. Service Level Agreements (SLAs) are in-place that perform delegated activities on behalf of Providence. Metrics on the SLAs regarding Regulatory Compliance obligations are monitored via auditing activities and all findings of non-compliance are reported as dictated per the contract.
- Training and Education
- Communication
- Enforcement of Standards
- Auditing and Monitoring
  - i. Providence conducts routine auditing and monitoring of operational departments and delegated entities to ensure compliance with policies and procedures, CMS, Federal and State standards and contractual obligations. Operational departments are expected to promptly address identified areas of non-compliance. Findings of non-compliance are reported to the PHP PHA Compliance and Risk Committee and Board as needed.
  - ii. Providence will participate in, and will require applicable delegated entities to participate in, external audit requests by regulators or other relevant organizations that maintain regulatory compliance expectations and oversight.
- Responses and Detected Offenses
- Fraud and Abuse

IV. As Part of the Compliance Program, the Company is committed to the prevention and detection of fraud, waste and abuse. A comprehensive fraud, waste and abuse program is overseen by the Director of Payment Integrity. The Director of Payment Integrity reports directly to the Chief Compliance and Risk Officer. Notification is provided to the impacted Coordinated Care Organization of investigation involving Oregon Medicaid funds. (See policy RA 25).

V. Annually, the Sr. Director Compliance – Compliance Officer will review and update the Compliance Program.

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**REFERENCES:**

Providence St. Joseph Code of Conduct  
 PHP PHA Standards of Conduct  
 42 CFR §422.503(b)(4)(vi) and §423.504(b)(4)(vi)  
 Chapter 9 of the Medicare Prescription Drug Manual  
 Medicare Advantage Compliance Program/Plan Document  
 Chapter 21 of the Medicare Advantage Manual, Compliance Program Guidelines  
 RA 63 Non-Intimidation and Non-Retaliation Policy  
 RA 60 Reporting Investigation and Resolution of Potential Noncompliance Concerns Policy  
 RA 58 Compliance Training and Education Program Policy  
 AD 1.0 Policy Format and Maintenance Policy  
 RA 25 Fraud, Waste and Abuse Program Policy  
 OAR 410-120-1510 Medical Assistance Programs  
 Oregon Health Plan Health Plan Services Contract Coordinated Care Organization Contract Exhibit B  
 – Statement of Work – Part 9 – Program Integrity