

Policy and Procedure		
SUBJECT: Medicare Advantage Compliance Program	DEPARTMENT: Regulatory Compliance, Risk Management and Government Affairs	
ORIGINAL EFFECTIVE DATE: 01/10	DATE(S) REVIEWED/REVISED: 01/11, 05/12, 03/14, 12/15, 09/16, 12/17, 09/18, 05/19, 04/20	
APPROVED BY: Chief Compliance and Risk Officer	NUMBER: RA 62	PAGE: 1 of 2

SCOPE:

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

APPLIES TO:

Medicare Caregivers and First Tier, Downstream and Related Entities (FDRs)

POLICY:

In accordance with CMS guidelines, Company has developed and implemented an effective Medicare Advantage Compliance Program that demonstrates the Companies commitment to comply with all Medicare regulations.

PROCEDURE:

The Medicare Compliance Officer oversees and is ultimately responsible for the Medicare Advantage Compliance Program and operations therein. The Medicare Compliance Officer, reports directly to the Chief Compliance and Risk Officer who periodically reports directly to the governing board. The Chief Compliance and Risk Officer is also responsible for chairing the Company’s Compliance Committee. The Medicare Compliance Officer is the primary liaison with CMS and is responsible for ensuring Compliance with all Medicare Advantage requirements on a daily basis.

The Manager of the Medicare Compliance Program is responsible for the daily implementation, operational oversight, and ongoing management of the Medicare Advantage Plans Compliance Program. The Manager of the Medicare Compliance Program, reports directly to the Medicare Compliance Officer. Specifically, the Medicare Compliance Officer and/or the Manager of the Medicare Compliance Program perform or supervise the following functions:

- Policies and Procedures
- Standards of Conduct
- Compliance Caregivers
- Compliance Oversight
- Training and Education
- Communication
- Enforcement of Standards
- Auditing and Monitoring
- Responses to Detected Offenses
- Fraud and Abuse

Policy and Procedure	
SUBJECT: Medicare Advantage Compliance Program	DEPARTMENT: Regulatory Compliance, Risk Management and Government Affairs
ORIGINAL EFFECTIVE DATE: 01/10	DATE(S) REVIEWED/REVISED: 01/11, 05/12, 03/14, 12/15, 09/16, 12/17, 09/18, 05/19, 04/20
APPROVED BY: Chief Compliance and Risk Officer	NUMBER: RA 62 PAGE: 2 of 2

On an annual basis the Medicare Compliance Officer and Manager of the Medicare Compliance Program will update and make any changes to the Medicare Advantage Compliance Program.

REFERENCES:

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