

Policy and Procedure		
SUBJECT: PHP/PHA Standards of Conduct and Policies and Procedures		DEPARTMENT: Regulatory Compliance, Risk Management and Government Affairs
ORIGINAL EFFECTIVE DATE: 01/11		DATE(S) REVIEWED/REVISED: 05/12, 03/14, 12/15, 09/16, 12/17, 09/18, 05/19, 04/20, 04/21, 06/22, 03/23, 04/24, 05/25
APPROVED BY: Chief Compliance and Risk Officer		NUMBER: RA 65 PAGE: 2 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 Off Exchange <input type="checkbox"/> Washington Off Exchange	<input type="checkbox"/> Oregon On Exchange (SHOP) <input type="checkbox"/> Oregon Off Exchange (SHOP)	<input type="checkbox"/> Oregon <input type="checkbox"/> Washington	<input type="checkbox"/> ASO <input type="checkbox"/> PBM	<input type="checkbox"/> Medicare Advantage <input type="checkbox"/> Medicare Supplement <input type="checkbox"/> Medicare Advantage – D-SNP	<input type="checkbox"/> Medicaid
<input checked="" type="checkbox"/> APPLIES TO ALL ABOVE LINES OF BUSINESS					

POLICY:

Company will maintain written policies, procedures, and standards of conduct that describe the organization's commitment to comply with all applicable Federal and State standards and compliance expectations.

PROCEDURE:

All caregivers and first tier, downstream and related entities are expected to comply with all written policies, procedures, and Standards of Conduct. This is done in accordance with Companies policies.

The Providence Health Plan (PHP) and Providence Health Assurance (PHA) Standards of Conduct is a separate document that is a companion document to the Providence St. Joseph Code of Conduct. The document includes the Company's commitment to comply with all applicable Federal and State laws; our commitment to conduct business with the highest ethical standards; procedures to avoid and address conflicts of interest; and our procedures for Fraud, Waste and Abuse (FWA) prevention, detection, and correction. The Standards of Conduct document communicates to

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caregivers and FDRs that compliance is everyone's responsibility. It describes Companies compliance expectations of caregivers and FDRs; the operational procedures and implementation of our Compliance Program; provides guidance to caregivers and FDRs on dealing with potential compliance issues; informs caregivers and FDRs on how to communicate compliance issues to an appropriate caregiver; and includes a description of the investigation and resolution process for potential non-compliance issues. Company clearly outlines the expectation that all caregivers, FDRs, management, and governing body report violations of law, regulations, or CMS requirements to the Company. In addition, the Standards of Conduct document specifies that disciplinary actions will be imposed for violation of law and ethics, non-compliance, and FWA.

For Caregivers:

- All caregivers have access to approved Company policies and procedures and the Standards of Conduct via a link posted on the Regulatory Compliance, Risk Management and Government Affairs (RCGA) intranet page, which also provides methods on reporting fraud, waste and abuse and non-compliance concerns.

For FDR's:

- All FDR's have access via a link to approved policies and procedures and Standards of Conduct posted on the FDR Website located at <https://www.providencehealthplan.com/searchresults?searchRequest=%7B%22term%22%3A%22FDR%22%7D>. This website also provides methods on reporting fraud, waste and abuse and non-compliance concerns.

Written policies, procedures and standards of conduct are reviewed at a minimum on an annual basis by the RCGA department and are updated as necessary to incorporate any changes in applicable laws, regulations and other requirements.

REFERENCES:

42 CFR §422.503(b)(4)(vi) and §423.504(b)(4)(vi), Chapter 9 of the Medicare Prescription Drug Manual, Chapter 21 Medicare Managed Care Manual, Compliance Program Guidelines