

<b>Policy and Procedure</b>		
SUBJECT: Medicare Advantage Plans Standards of Conduct and Policies and Procedures	DEPARTMENT: <b>Regulatory Compliance, Risk Management and Government Affairs</b>	
ORIGINAL EFFECTIVE DATE: <b>01/11</b>	DATE(S) REVIEWED/REVISED: 05/12, 03/14, 12/15, 09/16, 12/17, 09/18, 05/19, 04/20	
APPROVED BY: Chief Compliance and Risk Officer	NUMBER: <b>RA 65</b>	PAGE: <b>1 of 2</b>

**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:**

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 Medicare Advantage Plans Standards of Conduct is a separate Medicare specific document that is a companion document to the Providence Code of Conduct. The document includes the Companies 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 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, Medicare program non-compliance and FWA.

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For Caregivers:

- All caregivers have access to approved policies and procedures posted on the intranet page under Document Central, a centralized database created to house all Company policies and procedures.
- All caregivers also have access to the standards of conduct posted on the intranet page under Regulatory Compliance, Risk Management and Government Affairs (RCRMGA) home page, that 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://healthplans.providence.org/providers/news-events/Pages/mandatory-training.aspx>. 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 RCRMGA 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