Providence Health Assurance
Policy and Procedure

<table>
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<tr>
<th>SUBJECT: Medicare Advantage Reporting, Investigation and Resolution of Potential Non-Compliance Concerns</th>
<th>DEPARTMENT: Regulatory Compliance and Government Affairs</th>
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<tr>
<td>ORIGINAL EFFECTIVE DATE: 01/11</td>
<td>DATE(S) REVIEWED/REVISED: 01/12, 05/12, 03/14, 12/15, 09/16</td>
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<tr>
<td>APPROVED BY: Chief Compliance Officer</td>
<td>NUMBER: RA 60</td>
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POLICY:
Providence Health Assurance (PHA) in accordance with the below regulations will conduct a timely and reasonable investigation and issue a prompt response to reported potential non-compliance issues. Potential non-compliance concerns include suspicion that specific activities may be violating laws, rules, regulations, policies or standards of the code of conduct.

APPLIES TO:
All PHA Caregivers, First Tier, Downstream and Related Entities (FDRs)

REFERENCES:
Providence Medicare Advantage Plans Compliance Program, CFR §422.503(b)(4)(vi)(g) and §423.504(b)(4)(vi)(g), Chapter 9 of the Medicare Prescription Drug Manual, PH&S Policy, PROV-ICP-1705, Chapter 21 of the Medicare Managed Care Manual, Compliance Program Guidelines

PROCEDURE:
PHA is committed to identifying and correcting detected non-compliance issues. PHA ensures that all potential non-compliance issues are identified and addressed in a reasonable and timely manner. All PHA caregivers and FDR’s may report a potential non-compliance concern through a variety of communication mechanisms, which ensure non-intimidation/ retaliation and confidentiality of the reporting individual.

In the instance of a suspected and/or potential compliance issue, all PHA caregivers and FDR’s are required to report such issues to Regulatory Compliance and Government Affairs (RCGA). RCGA will investigate appropriately and follow the standard processes for reported compliance issues.

PHA caregivers may report potential non-compliance issues/concerns via the RCGA intranet page. A link is provided to caregivers that automatically notifies appropriate RCGA leadership of the potential issue/concern.
FDRs must immediately report any potential non-compliance violations, including unethical or illegal behavior. The report may be submitted several ways. FDRs can report potential compliance issues directly to the Delegation Program Coordinator or issue may be faxed to 503-574-6543, or a message can be left for the for PHA's Medicare Compliance Officer at 503-574-6437 or a call can be made to the confidential Providence Integrity Line at 888-294-8455, 24 hours a day, seven days a week.

If PHA caregivers or FDR's would prefer to report anonymously, they may fax the concern/issue to (503) 574-6543, or send a written concern via interoffice mail or leave a message for the Medicare Compliance Officer at (503) 574-6437 or call the confidential 24/7 Providence Integrity Line at (888) 294-8455.

The Medicare Compliance Officer will research and conduct a thorough investigation for each notification received using the procedures outlines in the document “Investigation Protocols for Reports of Non-Compliance”. The Medicare Compliance Officer is obligated to report any non-compliance to the PHA board, and The Centers for Medicare and Medicaid Services (CMS). Instances of non-compliance are reported on the monthly Medicare Advantage Compliance Scorecard as well.

All PHA first tier, downstream, or related entities are subject to the aforementioned requirements and in the event of any potential misconduct are required to undergo the processes listed above. Regardless of where the misconduct is identified, PHA is responsible for initiating a timely and reasonable investigation and response.

In addition, PHA follows policies outlined in Providence Health Systems policy Prov-ICP-705.