

KS Plan Administrators	Compliance Policy Manual	POLICY NO: CP 6 PAGE 1 of 3
Subject: Compliance Hotline		Date: October 2012 Last Revised: October 2021 Last Reviewed: October 2021
DISTRIBUTION: All Departments		FUNCTIONAL AREAS: All Departments
SUPERCEDES POLICY: N/A		REFERENCE/ATTACHMENT: Medicare Managed Care Manual Ch 21 Compliance Program Guidelines
Prepared by: Johnathan Randle Revised by: John Kimble		DATE APPROVED: October 11, 2012, Revision Approved: December 1, 2021

I. Goal

To ensure that employees, supervisors, managers, and administrators report all suspected and/or actual misconduct and fraud waste and abuse (FWA) to the appropriate personnel without fear of retaliation.

II. Policy

All employees, supervisors, managers and administrators are required under the compliance program to report, anonymously if desired, known or suspected violations of an applicable law, regulation, or the Code of Conduct, without fear of retaliation. While the SIU has primary accountability for investigating FWA, all employees share the responsibility of detecting or preventing FWA.

The Compliance Hotline is 713-442-9595

Procedure / Guidelines for Compliance		Responsible Party
1.	Compliance Hotline Greeting Script You have reached the KelseyCare Advantage Compliance and Fraud, Waste and Abuse hotline. Any information you provide, including your identity, will be kept in confidence between you and the Compliance Department and the Special Investigations Unit to the extent legal and feasible. You will not be punished for reporting potential compliance violations, or requesting assistance from the Compliance Department, even if you mistakenly report what you reasonably believe to be an act of wrongdoing. In the event that government authorities become involved, in the case of lawsuit, or if the need otherwise arises for our organization to disclose the information, such information may be disclosed. Please state your concern about compliance	ALL KSPA Employees' Supervisors, Managers, Subsidiaries, Affiliates, Vendors

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	misconduct or fraud waste and abuse giving as much detail as possible, including the date the conduct occurred. A more thorough follow up is possible if you provide contact information, but you may remain anonymous if you wish.	
2.	<p>Failure to Report Any personnel who fail to report a suspected violation may be subject to disciplinary action, up to and including termination. In addition, a supervisor who condones or tolerates such a violation may also be subject to disciplinary action, up to and including termination.</p>	ALL KSPA Employees' Supervisors, Managers, Subsidiaries, Affiliates, Vendors
3.	<p>Reporting Methods: A known or suspected violation may be reported by any of the following methods:</p> <ul style="list-style-type: none"> • By Telephone: The Hotline (713-442-9595) is a dedicated telephone line and voice mailbox that can be used twenty-four hours a day, from any location, for reporting concerns or violations. • In writing: Potential Non-compliance or potential FWA Reporting may be mailed, personally delivered to the Compliance Department or send by inter-office mail. Also via the anonymous online reporting available on the KelseyCare Advantage website. • In person: A report may be made in person by contacting the Compliance Department, the reporting employee's supervisor or manager, or any member of the Compliance Committee. • Email: A report may be made by sending an email to Medicarefraudhotline@kelseycareadvantage.com <p>All reporting avenues are verified on a monthly basis to confirm continued access.</p>	ALL KSPA Employees' Supervisors, Managers, Subsidiaries, Affiliates, Vendors
4.	<p>Potential Escalation: Compliance Department Management and the SIU will determine whether there is credible evidence of misconduct or FWA from any source and, after reasonable inquiry, has reason to believe that the misconduct may violate criminal, civil, or administrative law an incident report will be submitted to the Senior Management, FWA Committee and/or Human Resources.</p>	Compliance Department, SIU

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