

<b>KS Plan Administrators</b>	<b>SUBJECT: Compliance Committee</b>	<b>POLICY NO: CP 1 PAGE 1 of 4</b>
<b>Reference: Prescription Drug Benefit Manual, Ch. 9- Compliance Guidelines</b>	<b>DATE: August 2012</b>	<b>REVISION:</b>
<b>DISTRIBUTION: All Departments</b>	<b>FUNCTIONAL AREAS: All Departments</b>	
<b>SUPERCEDES POLICY: N/A</b>	<b>REFERENCE/ATTACHMENT:</b>	
<b>PREPARED BY: Johnathan Randle</b>	<b>DATE APPROVED: October 11, 2012</b>	

**I. Goal**

To ensure effective implementation and oversight of the KS Plan Administrator, LLC Compliance Program

**II. Policy**

KS Plan Administrators will establish and maintain a Compliance Committee. The Committee is primarily responsible for fully implementing the Compliance Program, overseeing its operations and ensuring its effectiveness. The Committee shall also provide leadership in establishing a culture of ethical conduct and compliance with the organization.

<b>Procedure</b>		<b>Responsible Party</b>
1.	<p>Mission KSPA is committed to conducting its business operations with honesty, integrity, and in full compliance with all applicable federal and state standards. The mission of the Compliance Committee is to ensure KSPA honors this commitment. The Compliance Committee fulfills its mission by:</p> <ul style="list-style-type: none"> <li>A. Overseeing implementation and execution of the Corporate Compliance Program</li> <li>B. Providing leadership to the organization in the area of regulatory compliance and ethical conduct.</li> <li>C. Providing guidance to employees and others for dealing with potential compliance issues</li> </ul>	Compliance Committee
2.	<p>Authority The Compliance Committee is authorized to fulfill its mission by, and is accountable directly to, the KSPA Board of Directors.</p> <p>The Compliance Officer and Compliance Committee report directly and are accountable to the organization's President and Board of Directors.</p> <p>The governing body will:</p> <ul style="list-style-type: none"> <li>• Be knowledgeable about the content and</li> </ul>	Board of Directors

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	<p>operations of the Compliance Program.</p> <ul style="list-style-type: none"> <li>• Exercise reasonable oversight for implementation and effectiveness of the Compliance Program</li> </ul>	
3.	<p><b>Membership</b></p> <p>Compliance Committee membership shall consist of the Compliance Officer, President, VP of Marketing, Mgr, Compliance and Regulatory Affairs, Medical Director, and Key departments or functions within the organization, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Medical/Clinical Services</li> <li>• Pharmacy Operations</li> <li>• Finance</li> <li>• Member Services</li> <li>• Enrollment</li> </ul> <p>The Compliance is a senior oversight body. Members must be capable of evaluating and addressing issues affecting all levels and areas across the organization, as well as their specific areas of direct authority.</p>	Compliance Committee
4.	<p><b>Committee Responsibilities</b></p> <p>The primary responsibilities of the Compliance Committee include, but are not necessarily limited to, the following:</p> <ol style="list-style-type: none"> <li>1. Assist and advise the Compliance Officer with development and implantation of the Corporate Compliance Program.</li> <li>2. Meet on quarterly basis or more frequently as necessary to enable reasonable oversight of the Corporate Compliance Program.</li> <li>3. Analyze the organization's industry environment, the legal requirements with which it must comply, and implementing risk assessment monitoring and auditing work plan.</li> <li>4. Assess existing policies and procedures that address the identified risk areas for possible incorporation into the Corporate Compliance Program. Policies and procedures will be updated, Medicare specific and reflect Medicare current laws. They will also reflect</li> </ol>	Compliance Committee

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	<p>KSPA operation practices and any applicable state requirements.</p> <ol style="list-style-type: none"> <li>5. Work with KSPA departments to develop standards of conduct policies and procedures to promote compliance, describe compliance expectation, and detect potential violations.</li> <li>6. Recommend and monitor, in conjunction with the relevant departments, the development of internal systems and controls to carry out Medicare regulations and KSPA standards, policies and procedures.</li> <li>7. Determine the appropriate strategy or approach to promote adherence to the Compliance Program and to allow employee and FDRs to ask compliance questions and report potential violations confidentially or anonymously (if desired), such as through hotlines and email communication, without fear of retaliation.</li> <li>8. Develop a system to solicit, evaluate, and respond to complaints and problems.</li> <li>9. Monitor internal and external audits and investigations for the purpose of identifying troublesome trends and issues and implementing effective corrective and preventative actions.</li> <li>10. Develop innovative ways to implement appropriate corrective and preventative actions.</li> <li>11. Confer with Compliance Officer on findings of internal compliance review, recommendations, and follow-up actions to be taken on potential violations standards, rules, regulations, and laws.</li> <li>12. Participate in the development and approve the content of the annual Corporate Compliance Program Report, which is submitted to the Board of Directors.</li> <li>13. Provide regular and ad hoc reports on the status of compliance with recommendations to CHPC's governing body.</li> <li>14. Support the Compliance Officer's needs for sufficient staff and ensure that sufficient resources are committed to operations of the</li> </ol>	
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	<p>Compliance Program and all related polices, plans and activities.</p> <p>15. Ensure compliance training and education is effective and appropriately completed.</p>	
5.	<p><b>Meetings</b></p> <p>1. Frequency-The Compliance Committee will meet quarterly. The Compliance Officer will coordinate actual meeting dates and start times.</p> <p>2. Effectiveness-Committee members shall strive to make meetings as productive and time effective as possible. Every effort shall be made to start and end meetings on time. Committee members agree to:</p> <ul style="list-style-type: none"> <li>• Regularly attend all Committee meetings. If a Committee member is unable to attend a scheduled meeting, he/she should notify the Compliance Officer in advance and, if appropriate, designate a representative to attend in his/her place.</li> <li>• Arrive on time.</li> <li>• Prepare for each meeting. This includes review of materials that have been distributed ahead of time (agenda, minutes from the previous meeting, ect.) and completion of assigned action items.</li> <li>• Actively participate in each meeting.</li> </ul> <p>The Compliance Officer shall distribute the meeting agenda, draft minutes from the previous meeting, and any other materials that require Committee review far enough in advance to allow adequate preparation time.</p>	Compliance Officer and Committee