

KS Plan Administrators	SUBJECT: Communication	POLICY NO: CP 2 PAGE 1 of 5
Reference: Prescription Drug Benefit Manual, Ch. 9- Compliance Guidelines	DATE: August 2012	REVISION:
DISTRIBUTION: All Departments	FUNCTIONAL AREAS: All Departments	
SUPERCEDES POLICY: N/A	REFERENCE/ATTACHMENT:	
PREPARED BY: Johnathan Randle	DATE APPROVED: October 11, 2012	

I. Goal

To establish and implement effective, open lines of communication ensuring confidentiality between the Compliance Officer, members of the Compliance Committee employees, managers and governing body, and first tier downstream and related entities in support of the Compliance Program.

II. Policy

The Compliance Department will develop and maintain effective, appropriate lines of communication with all key stakeholders of the organization, including:

- All levels of management, the President, and Board of Directors
- Compliance Committee
- The Company employees at all levels
- Contracted partners
- Regulatory authorities
- As may become necessary, law enforcement agencies

The Compliance Officer will use these lines of communication to effectively communicate information about the Compliance Program, as well as information about laws, regulations, and guidance for KSPA and its FDRs, such as statutory, regulatory, and sub regulatory changes (e.g. HPMS memos) and changes to policies and procedures and the Code of Conduct.

These lines of communication will be assessable to all and allow anonymous and confidential good faith reporting of potential compliance issues as they are identified.

Procedure		Responsible Party
1.	<p>Communication with the President and Board of Directors</p> <p>The Compliance Officer will maintain open lines of communication with the Plan President and Board of Directors regarding activities of the Compliance</p>	Compliance Officer

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	<p>Committee and Compliance Department. This includes, but is not limited to the following:</p> <ul style="list-style-type: none"> • Compliance Committee Minutes: The Compliance Officer shall provide the Board of Directors a copy of the approved minutes from all Compliance Committee meetings. • Compliance Committee Minutes: The Compliance Officer shall provide the Board of Directors a copy of the approved minutes from all Compliance Committee meetings. • Compliance Program: Upon ratification by the Compliance Committee, the Compliance Officer shall forward a copy of the annual Compliance Work Plan, and any updates or revisions to the Compliance Program, to the Board of Directors for review and approval. • Quarterly Reports: The Compliance Officer shall provide the Board of Directors with quarterly reports summarizing key issues and results in the operation of the Compliance Program. The topics to be covered in the reports include, but are not limited to the following: <ul style="list-style-type: none"> • Audit Results: The Compliance Officer shall provide a summary of the results of all focused and routine compliance audits to the President and Board of Directors. • Compliance or Ethics Issues: The Compliance Officer shall inform the President and Board of Directors of any compliance or ethics related issues or concerns that represent significant potential risk to the organization. 	
2.	<p>Communication with the Compliance Committee As specified in the Compliance Committee Charter, the Committee will meet at least once per calendar quarter for the purpose of overseeing the Compliance Program (refer to Compliance policy # 1 on Committee responsibilities). The Compliance Officer, as Committee chair, sets the agenda and keeps / distributes the minutes, with input and approval of the Committee. The Compliance Officer will distribute to the Committee copies of the quarterly and annual reports provided to the Board of Directors. The Compliance Officer will also keep the Committee informed and seek its guidance on compliance or ethics issues that represent potential risk to the organization.</p>	Compliance Officer and Compliance Committee
3.	<p>Communication with Management The Compliance Officer and Compliance Committee will</p>	Compliance Committee,

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	<p>maintain open lines of communication with KSPA management staff. This inc KSPA will maintain open communication with our members and educate our members on identifying and reporting noncompliance and FWA. Methods of communication with our members include newsletters, bulletins, emails, meetings, information published on KSPA's website, etc. includes, but is not necessarily limited to, the following:</p> <ul style="list-style-type: none"> • Normal Organizational Channels: The Compliance Committee is comprised of management staff responsible for the main departments and functions within the organization. The structure of the Committee therefore facilitates communication with management. • Compliance Program: All management staff shall receive a copy of the Compliance Program, including all significant revisions. Managers are responsible for understanding the Compliance Program and distributing a copy to all employees. • Program Guidance: The Compliance Officer serves as the organization's main point of contact with regulatory authorities. The Compliance Officer shall route incoming program information and regulatory guidance to the appropriate individual(s). • Issues Tracking Log: The Compliance Department tracks compliance violations and issue within its share point site and disseminated to the appropriate manager to respond and resolve. HPMS memos and other form of regulatory communication and updates are logged into the Compliance Share Point site and disseminated to the appropriate staff. Compliance will track any action item associated with the memo and or updates and send out reminders until all require actions are taken. 	Compliance Officer and KSPA Management
4.	<p>Communication with Employees The Compliance Officer and Compliance Committee will maintain open lines of communication with employees at all levels of the organization. This includes, but is not necessarily limited to, the following: Compliance Program and Code of Conduct: All employees shall receive a copy of the Compliance Program, including the Code of Conduct, at the time of employment and upon revision thereafter. Standards of Conduct will be made available to delegated (first-tier, downstream, and related) entities. Employees shall be</p>	Compliance Officer Compliance Committee KSPA Management

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	<p>required to certify their receipt and understanding and return a signed Acknowledgment at the time of hire.</p> <p>Normal Organizational Channels: As noted above, the Compliance Committee is comprised of management staff with responsibility for key departments or functions within the organization. Routine or informal communication, particularly in situations where documentation is not required, may therefore be achieved through normal organizational channels</p> <p>Communication Plan – The annual Compliance Plan shall include a basic plan for ongoing employee communication. Examples of possible methods include newsletters, bulletins, emails, meetings, interviews, etc.</p> <p>(Note: This requirement may be satisfied in conjunction with requirements for employee training and education).</p> <p>Training and Education, Incident Reporting – As noted above, employee training and incident reporting are key aspects of organizational communication. These components are addressed in separate Policies and Procedures.</p>	
5.	<p>Communication with Contracted Entities The Compliance Officer and Compliance Committee will develop and utilize mechanisms for communicating with contracted entities, including health care providers, management service organizations, and brokers. Such communication will typically occur in collaboration with KSPA departments or committees having established methods of contractor communication. Examples include Contracting, Marketing, UM/QM, Delegation Oversight, and Claims Oversight.</p>	Compliance Officer and Committee
6.	<p>Communication with Regulatory Authorities KSPA will maintain open communication with regulatory authorities.</p> <p>The Compliance Officer is KSPA primary point of contact with regulatory authorities. Normal, ongoing communication with regulators will be routed through the Compliance Officer.</p> <p>Individual Departments may have such direct communication with regulatory authorities as is appropriate to fulfillment of their responsibilities. For</p>	Compliance Officer Compliance Committee Senior Management

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	<p>example, Enrollment may be required to contact CMS regarding retro-active transactions; IT may be required to contact the CMS Help Desk regarding transmission of data; etc.</p> <p>For elevated issues such as investigation, litigation, interaction with enforcement authorities, or any situation that poses similar risk to the organization, communication will be governed by, as appropriate:</p> <ul style="list-style-type: none"> Company policy, if applicable policy exists Direction from senior management Advice of outside counsel 	
7.	<p>Communication with Members: KSPA will maintain open communication with our members and educate our members on identifying and reporting noncompliance and FWA. Methods of communication with our members include newsletters, bulletins, emails, meetings, information published on KSPA's website, etc.</p>	