

KS Plan Administrators	SUBJECT: Reporting Misconduct	POLICY NO: CP 5 PAGE 1 of 2
Reference: Prescription Drug Benefit Manual, Ch. 9- Compliance Guidelines	DATE: September 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 ensure that employees, members of the governing body, beneficiaries, and first-tier, downstream, and related entities (FDRs) and their employees report all suspected and/or actual misconduct to the appropriate personnel without intimidation or fear of retaliation.

II. Policy

KSPA shall make every reasonable effort to ensure that its employees, members of the governing body, beneficiaries, and FDRs and their employees report any known or suspected violations of applicable law, regulation, or company policy.

Procedure / Guidelines for Compliance		Responsible Party
1.	<p>All employees, supervisors, managers, and administrators are required under the Compliance Program to report, anonymously if desired, any suspected and/or actual misconduct without fear of intimidation or retaliation for good faith reporting in the Compliance Program.</p> <p>KSPA has a no-tolerance policy for retaliation or retribution against any employee or FDR who in good faith reports suspected misconduct. KSPA must notify employees and FDRs that they are protected from retaliation for False Claims Act complaints, as well as any other applicable anti-retaliation protections. In addition to non-retaliation, when a suspected compliance issue is reported, KSPA should also provide the complainant with information regarding expectations of a timely response, confidentiality, and progress reports.</p>	ALL KSPA Employees' Supervisors, Managers,
2.	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.	ALL KSPA Employees' Supervisors, Managers,

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3.	<p>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: Compliance Reporting Forms may be mailed, personally delivered to the Compliance Department or send by inter-office mail. To report potential Fraud, Waste, or Abuse • 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 	ALL KSPA Employees' Supervisors, Managers,
4.	<p>Compliance Department Management will determine whether there is credible evidence of misconduct 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 given submitted to the Senior Management and Human Resources.</p>	Compliance Department