

KS Plan Administrators	SUBJECT: Compliance Hotline	POLICY NO: CP 6 PAGE 1 of 2
Reference: Prescription Drug Benefit Manual, Ch. 9- Compliance Guidelines		DATE: October 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, supervisors, managers, and administrators report all suspect and/or actual misconduct 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

The Compliance Hotline is 713-442-9595

Procedure / Guidelines for Compliance		Responsible Party
1.	<p>Compliance Hotline Greeting Script</p> <p>You have reached the KelseyCare Advantage Compliance hotline. Any information you provide, including your identity, will be kept in confidence between you and the Compliance Department, senior management to the extent legal and feasible. [However, in the event that government authorities become involved, in the case of lawsuit, or if the need otherwise arises for KSPA to disclose the information, such information may be disclosed.</p> <p>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.</p> <p>However, knowing fabricating, distorting, exaggerating or minimizing a report of wrongdoing in order to injure someone else or protect yourself will subject you to disciplinary action.</p>	<p>ALL KSPA Employees' Supervisors, Managers,</p>

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SUBJECT: Non-Retaliation		DATE: April 1, 2007 REVISED:

	Please state your concern about compliance misconduct 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.	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,
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.	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.	Compliance Department