

Dean Health Plan, Inc. / Dean Health Insurance, Inc.
Policies & Procedures

Title	Review and Distribution of the Compliance Plan, Code of Conduct, and Policies and Procedures	P&P #:	CC - 04
Product Line	All products	Effective Date	February 1, 2015
Department	Compliance	Next Review Date	July 1, 2018
Initially Developed by	Kathy Johnson	Date	March 2005
Last Revised by	Elizabeth Andrews	Date	July 1, 2017
Last MCO Approval	Elizabeth Andrews	Date	July 1, 2017
Last CCO Approval	Stephanie Cook	Date	July 5, 2017

Policy: Dean Health Plan, Inc. /Dean Health Insurance, Inc. (collectively “Dean”) has a Compliance Plan, which encompasses SSM Health’s Code of Conduct and Ethics. The Compliance Plan and any related policies and procedures shall be reviewed and revised at least annually such that they accurately reflect practices and requirements. The Center for Medicaid and Medicare Services (CMS) requires such written policies, procedures and standards of conduct. This is Element I of an effective compliance program.

Regulatory References: 42 CFR §§422.503(b)(4)(vi) and 423.504(b)(4)(vi); Medicare Managed Care Manual Chapter 21 – Compliance Program Guidelines and Prescription Drug Benefit Manual Chapter 9 – Compliance Program Guidelines, § 50.1.

Definitions: See CC-01

Procedure:

- 1) Dean shall have a Compliance Plan (which includes an overview of the SSM Health Code of Conduct and Ethics) and related policies and procedures that:
 - a) Articulate Dean’s commitment to comply with all applicable Federal and State standards;
 - b) Describe compliance expectations as embodied in the SSM Health Code of Conduct and Ethics;
 - c) Implement the operation of the compliance program;
 - d) Provide guidance to employees and others on dealing with suspected, detected or reported compliance issues;

Dean Health Plan, Inc. / Dean Health Insurance, Inc.
Policies & Procedures

- e) Identify how to communicate compliance issues to appropriate compliance personnel;
 - f) Describe how suspected, detected or reported compliance issues are investigated and resolved by Dean; and
 - g) Include a policy of non-intimidation and non-retaliation for good faith participation in the compliance program, including, but not limited to: reporting potential issues, investigating issues, conducting self-evaluations, audits and remedial actions, and reporting to appropriate officials.
- 2) Changes to Compliance Plan or Policies and Procedures Upon Request:
- a) At any time, Dean senior leadership and/or the DHI/DHP Compliance Committee may request an addition or change to the Compliance Plan or related policies and procedures due to an inaccuracy or change of policy.
 - b) All requests to revise or update information are directed to the Corporate Compliance Officer (CCO).
 - c) Once received, the CCO, or his or her designee(s), reviews the request and verifies the information or policy change with the appropriate department(s).
 - d) If the requested changes are valid and appropriate, the CCO, or his or her designee, makes the changes. The CCO and MCO approve all such changes.
- 3) Annual Review of the Compliance Plan and Related Policies and Procedures:
- a) The following review and approval processes are completed annually.
 - b) Compliance Plan
 - i. The annual review is done by the CCO and/or his or her designee(s) within the Compliance Department.
 - ii. The CCO and MCO approve all changes to the Compliance Plan.
 - iii. The CCO or designee reports any material changes to the DHI/DHP Compliance Committee and Board Audit Committee.
 - c) SSM Health Code of Conduct and Ethics
 - i. The annual review is done by the CCO and/or System Vice President of Corporate Responsibility.
 - ii. The System Vice President of Corporate Responsibility approves all changes to the Code of Conduct and Ethics and reports any material changes to the Board of Directors.
 - iii. The Board of Directors approves any material changes.
 - d) Compliance Program Policies and Procedures
 - i. Compliance Program Policies and Procedures are labeled as CC__
 - ii. The annual review is done by the CCO and/or his or her designee(s) within the Compliance Department.

Dean Health Plan, Inc. / Dean Health Insurance, Inc.
Policies & Procedures

iii. The CCO and MCO approve all changes to the policies and procedures.

4) Distribution

a) Employees/Contractors

- i. The Compliance Plan, SSM Health Code of Conduct and Ethics, and related policies and procedures are maintained on a Compliance SharePoint page that is accessible to all employees and contractors. This page will be updated as changes are made to these documents. Employees and contractors will be notified of such updates via the Compliance Times and Purple Pages.
- ii. During the new and annual compliance training, all employees and contractors are provided the Compliance Plan and SSM Health Code of Conduct and Ethics. See CC-08 for more information on the new and annual compliance training.

b) FDRs

- i. The Compliance Plan, SSM Code of Conduct and Ethics, and compliance policies and procedures that are relevant to FDRs are maintained on Dean's external FDR webpage. See CC-15 for more information about the annual attestation process.

5) Documentation

- a) Document revisions and approvals are recorded in the revision table within the applicable document.
- b) The Compliance Plan and related policies and procedures are stored and updated within a document library on Compliance's SharePoint site.