

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

Title	Effective Lines of Communication/Reporting Compliance Violations	P&P #:	CC - 12
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, MCO	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 Insurance, Inc. and Dean Health Plan, Inc. (collectively “Dean”) is committed to fostering communication between the Corporate Compliance Officer (“CCO”), Medicare Compliance Officer (“MCO”), employees, contractors, FDRs, and members of the Board of Directors. All such individuals are required to immediately report potential incidents of non-compliance. Dean does not retaliate against individuals for the good faith participation in the compliance program which includes, but is not limited to, reporting potential issues, investigating issues, conducting self-evaluations, audits and remedial actions, and reporting to appropriate officials. Dean promotes an open door policy and encourages employees and contractors to approach their supervisor, senior-ranking personnel, Human Resources, the MCO, and/or the CCO with any concerns. Dean maintains the confidentiality of all reporting to the greatest extent possible. Having effective lines of communication is Element IV of an effective compliance program per CMS.

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, § 50.4.

Definitions: See CC-01

Procedures:

- 1) Mechanisms for Asking Compliance Questions or Reporting Potential/Actual Non-Compliance
 - a) Mail:
 - i. Dean Health Plan, ATTN: Compliance Officer, 1277 Deming Way, Madison, WI 53717.

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- ii. May be done anonymously.
 - b) Compliance Hotline:
 - i. (608) 827-4333 or toll free at (877) 317-0255
 - ii. Available 24 hours a day, 7 days a week.
 - iii. May be done anonymously.
 - c) DHP.FDROversight@deancare.com
 - i. FDRs must report potential non-compliance within 2 business days of identification by sending the Vendor Non-Compliant Incident Reporting Form (see CC-12 Appendix A), or other comparable form, to this address.
 - d) [Compliance Request Form](#)
 - i. Available in ServiceNow to employees and contractors.
 - ii. Accessible through direct website link or via the Compliance Purple Pages.
 - iii. This is the primary mechanism for asking for a Compliance Department opinion.
 - iv. May not be done anonymously.
 - e) [Compliance Incident Reporting Form](#)
 - i. Available in ServiceNow to employees and contractors
 - ii. Accessible through direct website link or via the Compliance Purple Pages.
 - iii. This is used for reporting potential incidents of non-compliance, including HIPAA violations.
 - iv. May not be done anonymously.
- 2) Mechanisms for Reporting Suspected FWA:
- a) Fraud Hotline:
 - i. (877) 249-2176
 - ii. May be done anonymously.
 - b) Email:
 - i. SIU.DHP@deancare.com
 - ii. May not be done anonymously.
 - c) SIU Referral Form on the DHP Purple Pages
 - i. May be done anonymously if mailed to Dean Health Plan, ATTN: SIU, 1277 Deming Way, Madison, WI 53717.
- 3) Mechanisms for Distributing Compliance Information
- a) The Compliance Department sends a newsletter, *The Compliance Times*, every Friday to employees and contractors that have signed up on the distribution list. *The Compliance Times* features information about new regulatory guidance and webinars as well as an article about a compliance topic drafted by a member of the Compliance Department.
 - b) The Compliance Department communicates with employees and contractors via email, Purple Pages articles, flyers and training sessions. These communications occur throughout the year; however, they are particularly concentrated during the annual “Compliance Month” or “Compliance Week”.
 - c) The Compliance Department distributes regulatory changes and communications via the Regulatory Change and Communications Committee (“RCC”). Regulatory communications include HPMS memos. The RCC ensures that all such changes and

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communications are addressed and operationalized, as necessary. Official meeting minutes are stored on the Compliance SharePoint site.

- i. If guidance pertains to FDR operations, the RCC ensures the FDR is aware of, and implements changes required from, that guidance. The Compliance Department may elect to refrain from such FDR outreach if it determines the FDR has an effective process for tracking and responding to guidance.
- d) The CCO provides updates on the status of the Compliance Program to the DHI/DHP Compliance Committee, Board Audit Committee, and Board of Directors. Official meeting minutes are stored on SharePoint.
- e) The Compliance Department maintains a website for use in distributing information to FDRs.