

Policies and Procedures

Policy Title Compliance and Integrity			
Department Responsible Compliance and Integrity	Policy Code HTA – 1.00	Effective Date December 2015	Next Review Date November 2018
Title of Person Responsible Compliance Officer	Approval Council Healthteam Advantage Board of Directors		Approved Date December 10, 2015

PURPOSE

The purpose of this policy is to establish the framework for the Company's Compliance and Integrity Office program. Care N' Care Insurance Company of North Carolina, Inc., d/b/a Healthteam Advantage (HTA), understands a strong compliance, ethics and integrity program is core to developing accountability and transparency. Additionally, HTA understands that participation in federal programs is a tremendous responsibility and is committed to following the best practices and guidance from the United States Sentencing Commission and the Centers for Medicare & Medicaid Services.

DEFINITIONS

N/A

POLICY

It is the policy of HTA to comply with all applicable federal, state and local laws and regulations. In addition, it is the policy to have a Code of Conduct that is reviewed and approved by the Board of Directors, the President of the Company, and by the Corporate Compliance and Integrity Committee. This policy applies to all employees, members of the Board of Directors (when acting on behalf of the Company), first tier, downstream and related (FRDs) entities, contractors, and all agents of the Company.

RESPONSIBILITIES

Board of Directors

- Receive and review reports from the Compliance Officer
- Evaluate the effectiveness of the Compliance and Integrity Office program
- Review high risk issues of compliance

Compliance Officer

- Is a full-time employee of HTA and does not have operational accountabilities.
- Develops written policies and procedures and a Code of Conduct that support HTA's policy to comply with all applicable federal, state, and local laws and regulations.
- Operationalizes the components of the Code of Conduct.
- Distribute the applicable policies and procedures and Code of Conduct to employees.
- Provide in-person, a report to the President on the Compliance and Integrity program at least quarterly.
- Provide in-person, a report to the Board of Directors on the Compliance and Integrity program at least four times per year.
- Provide general compliance and fraud, waste and abuse training to employees.

- Chair the Corporate Compliance and Integrity Committee, which is responsible for overseeing the Compliance and Integrity program that meet at least four times per year.

Departmental Management

- Will help ensure that employees understand and participate in the Compliance and Integrity program, training and understanding of their responsibilities.
- Monitor Compliance and Integrity.
- Develop departmental specific policies and procedures that support the function and applicable laws and regulations.

REFERENCE DOCUMENTS/LINKS

- United States Sentencing Commission Seven Elements of an Effective Compliance Program
- Centers for Medicare & Medicaid Services, Prescription Drug Benefit Manual Chapter 9, Compliance Program Guidelines and Medicare Managed Care Manual Chapter 21, Compliance Program Guidelines
- 42 CFR 422.503
- 42 CFR 423.504

PREVIOUS REVISION/REVIEW DATES

Date	Reviewed	Revised	Notes
N/A	N/A	N/A	This is a new policy.
September 2016	X	N/A	
July 2017	X	N/A	
November 2017	X	N/A	