Health Plan Policy

Scott & White Health Plan  Insurance Company of Scott & White

Product Lines

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<th>Individual HMO</th>
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Compliance Issue Resolution Policy

Policy Owner: Compliance Department

Original Effective Date: 3/17/2008

Approval Date: 9.5.2013

Policy Number: Com.Org 011

Revision Dates: 11/27/2012; 8/16/2013

Reviewed w/o Revisions:

Next Review Date: 8/1/2014

Allan Emboden, President & CEO

Pamela O'Bannon, Compliance Officer

I. PURPOSE

Scott & White Health Plan implemented a Compliance Program in an effort to establish a culture within the organization that promotes prevention, detection and resolution of misconduct. This is accomplished, in part, by establishing communication channels for employees, members or vendors to report problems and concerns. Employees, members or vendors are encouraged to report issues via the traditional chain of command, Human Resources, Compliance hotline, Legal Department or directly to the Compliance Officer. Therefore, the Compliance Officer is responsible for responding to any issue that is raised through the various communication channels. This policy is designed to establish a framework for managing and responding to compliance issues that are brought to the attention of the Compliance Department.
II. SCOPE
This policy applies to all employees, members, vendors and providers of Scott & White Health Plan.

III. DEFINITIONS
None

IV. POLICY

1. Employees are allowed to use any communication channel they deem appropriate to report issues. Retaliation or retribution for reporting issues in good faith is prohibited. To the extent practical or allowed by law, the Compliance Officer must maintain the confidentiality or anonymity of an employee when requested.

2. SWHP will establish and maintain telephone hotlines for employees, members and vendors. For employees who want to report problems and concerns anonymously, the hotline number to use is 1-888-800-1096. For members, vendors or providers who want to report problems and concerns anonymously, the hotline number to use is 1-888-484-6977. The Compliance Officer (CO), or designee, is responsible for the daily operation of the hotlines.

3. It is the responsibility of SWHP staff to report perceived misconduct, including actual or potential violations of laws, regulations, policies, procedures or Scott and White Guiding Business Principles for all lines of business.

4. Any SWHP staff who commits or condones any form of retaliation will be subject to discipline up to, and including, termination.

5. The Compliance Officer is only responsible for resolving compliance-related issues; however, employees should not be discouraged from using any specific communication channel. Rather, employees should be politely redirected or the Compliance Officer should redirect noncompliance related issues to the appropriate department or individual.

6. The Compliance Officer is responsible for the compliance program at Scott and White Health Plan for all lines of business; therefore, issues related to the operation of the program should be addressed by reporting to the appropriate channel for resolution including the Compliance Officer, Legal Department or anonymously through the hotline.

V. REFERENCE/REGULATIONS
CMS Medicare Managed Care Manual Chapter 21