



Series Compliance

Policy Name: Compliance Plan

Policy Number: 1512

Origination Date: 3/5/2024

Revised:

Regulation: Standard / **Reference:** Compliance Program Guidance for Medicare+Choice Organizations (64 Federal Register Reg. 61893 11-15-1999, Medicare Managed Care Manual (MMCM) / Prescription Drug Benefit Manual (PDBM) Chapters 21 & 9 Compliance Program Guidance (Pub 100-16), DOJ Evaluation of Corporate Compliance Program, updated June 2020

Policy:

Communities Connected for Kids (CCKids) is committed to complying with applicable federal and state laws, rules, and regulations by adhering to high standards of business ethics as reflected in this Compliance Plan.

Written Policies, Procedures and Standards of Conduct

CCKids has developed clearly written policies & procedures that support the Organization's commitment to comply with all state and federal standards. Because regulatory and other requirements can change, policy review is conducted on no less than an annual basis. Policy reviews are conducted with oversight from the Compliance Officer. CCKids maintains a Code of Business Conduct and Ethics policy. This Code of Business Conduct and Ethics is also located in the CCKids employee handbook. The Business Ethics policy #1502 provides a guide that explains roles within the Organization and how the individual roles interact both internally and externally. The policy provides a resource for an associate that communicates the expectation associates are responsible for in fostering a culture of ethical behavior. All CCKids policies, are posted on our public-facing website and readily accessible to associates.

Designating a Compliance Officer and a Compliance Committee

The Compliance Officer (CO) is a full-time employee of CCKids and is responsible for the day-to-day operation of the Compliance Plan and on behalf of the Compliance Committee will provide periodic reports to the CEO and Board of Directors, on the activities and status of the compliance program. Unresolved issues will also be reported with a description of the identified risk and risk status to CCKids. The Compliance Officer has unrestricted access to the Board of Directors for Compliance reporting including Fraud, Waste, and Abuse (FWA) and overpayments.

The CCKids Compliance Committee is comprised of members of the Senior Management Team. This group is responsible for monitoring significant issues and risks as identified by the Compliance Officer and the Compliance Committee. The Compliance Officer meets quarterly with the CCKids CEO in which discussions pertain to the outcomes of the Compliance Committee.



Effective Training and Education

CCKids New Hire and Annual Compliance Training is the cornerstone of the Organization's Corporate Compliance Plan. This training is required by all CCKids employees including for temporary workers, volunteers and those entities contracted via a Business Associates Agreement and/or other related groups or individuals identified as first tier, downstream and related entities for the purposes of implementation of the organization's contract with Sunshine Health.

The successful completion of CCKids Compliance Training is required as an ongoing condition of employment. New Hire Compliance Training must be completed within the first 30 days of the associates effective start date of employment / contracting, and at least annually thereafter.

As with the New Hire and Annual Compliance Training, the training content will be reviewed annually and updated as appropriate to reflect changes in law and regulatory policy.

Training related documents will be maintained by CCKids for a period of ten (10) years. Examples of training materials include, but are not limited to, training agendas, attendance and assessments including individual assessment scores.

HIPAA/Security Training:

CCKids is committed to complying with federal, state and any rule or regulation associated with the privacy of protection of health and financial information. The HIPAA Privacy Rule provides federal protections for individually identifiable health information helped by covered entities and their business associates and gives CCKids consumers an array of rights with respect to that information.

CCKids Compliance Officer assists in the development of the Organization's HIPAA/Privacy Policies. The role of the Compliance Officer in this capacity is to provide updates applicable to federal and state laws and regulations and to provide an initial New Hire and thereafter an annual HIPAA/Privacy Training.

Disciplinary Standards and Enforcement:

CCKids supports a compliant culture by maintaining well publicized disciplinary guidelines. These policies are clearly written and easily accessible and available on the CCKids Intranet. CCKids disciplinary policies are clear and apply to all employees.

Disciplinary policy 1506 undergoes annual reviews; changes necessary to these policies outside of a scheduled review will be disseminated to all associates accordingly.

Business partners /subcontracted providers/ and first tier, downstream related entities are responsible for complying with CCKids Policies and Procedures. Potential disciplinary action for violations could include Corrective Action Plans (CAP), retraining related to the identified violation or termination of the contract with the individual/entity. External individuals/entity will have access to disciplinary policies upon execution of the individual business agreement or contract.



Routine Monitoring and Identification of Compliance Risks

The CO is responsible for ensuring the Human Resource Department activity of initial and ongoing OIG and GSA Exclusion Screening, as well as State exclusion screening are completed. The OIG's List of Excluded Individuals/Entities (LEIE) provides information to the health care industry, patients and the public regarding individuals and entities currently excluded from participation in Medicare, Medicaid, and all other Federal health care programs. Individuals and entities who have been reinstated are removed from the LEIE. Exclusion Screening is required before hiring any new associate, temporary worker, volunteer, contractor, supplier, or any entity or individual that would be collecting/receiving payment from CCKids as it relates to the contracted services of Sunshine Health/Centene. Exclusion screening must be conducted prior to hiring and monthly thereafter with a date recorded placed in the employee's file.

Other monitoring and auditing efforts include Internal Audits, Compliance Inspections, Annual Compliance Risk Assessment and other activities as identified by the CO and Compliance Committee.

Fraud, Waste, Abuse, & Overpayment:

Fraud refers to any "intentional" act committed to secure an unfair or unlawful gain. Abuse is a broad concept that refers to an activity that is not consistent with generally accepted business, medical or fiscal standard practices. Waste involves the overutilization of services, or other practices that create unnecessary costs. Overpayment includes any amount not authorized to be paid by the Medicaid program whether paid as a result of inaccurate or improper cost reporting, improper claiming, unacceptable practices, fraud, abuse or mistake.

Fraud or other misconduct is a violation of the CCKids Code of Conduct. It is the duty of an associate or affiliate acting on behalf of CCKids to report actual or suspected misconduct. If an associate or an affiliate is contacted by law enforcement or other government agencies, such contact should immediately be reported to the Compliance Officer. Reference CCKids policies 212 and 1509 for additional guidance.

Procedure and System for Prompt response to Compliance Issues and Undertaking Corrective Actions

CCKids has developed policies and procedures, processes, and systems for the identification of and response to compliance issues. Utilizing the tools in place to conduct timely investigations of identified issues, to proactively conduct self-assessments of business practices (self-reporting) and adherence to regulations and law is the most effective method to demonstrate to our regulators our commitment to compliance.

CCKids commitment to investigate allegations on non-compliance including allegations of fraud and misconduct is to initiate an investigation within 2 business days for when CCKids becomes aware of the alleged misconduct. Investigations of FWA are concluded within a reasonable amount of time. CCKids also can self-report identified instances of misconduct.

CCKids expects all associates to ensure policies are adhered to and to raise concerns via the Compliance Hotline



and/or the other communication resources / mechanisms referenced in the Code available when a compliance issue is suspected.


The CO is committed to the enforcement of Policies & Procedures and the prompt response to Compliance issues. The CO will act promptly and take appropriate corrective action. The CCO will ensure that noncompliance or FWA committed by any CCKids associates is documented and includes ramifications should the associate fail to satisfactorily implement the corrective action. The CO will develop and be responsible for creating a system or process to track the resolution of complaints; additionally, the CCO will maintain documentation of all compliance deficiencies identified and the corrective actions taken. The CO will conduct ongoing monitoring of corrective action plan (CAP) post implementation to ensure the effectiveness of the CAP.

Instances of suspected and confirmed FWA will be reported to the Sunshine Health Compliance at ComplianceFL@Centene.com. Policies will be enforced consistently through appropriate disciplinary actions.

Compliance Program Resources/Guidance:

Sunshine Health's Compliance Hotline: 1-800-345-1642
Compliance Unit Email: Compliance@sunshinehealth.com
Compliance Officer Telephone Number: 1-866-796-0530
Sunshine Health's Anonymous and Confidential Hotline: 1-866-685-8664

https://apps.ahca.myflorida.com/InspectorGeneral/fraud_compliantform.aspx

DocuSigned by:
Approved: 
665999492311426...

Carol Deloach, CEO

3/13/2024