

Hometown Health Plan

Current Version Effective Date: 02/28/13

Next Review Date: 02/28/14

Title: General Medicare Part D and Medicare Advantage Compliance Program Policies and Procedures (CGP)

Creation Date: 02/26/07

Category: Hiring, Employment and Contracting

Revision History:

Number: Hometown.CGP.005

10/25/12 _/ _/ _

Author: Jamie Winter, Hometown Health Compliance Manager

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Scope:

Unless otherwise limited, the Hometown Health Plan Compliance Policies and Procedures apply to the following individuals or entities:

- 1) All Employees as defined in Hometown.MPP.001;
- 2) All members of the Board of Directors, officers and managers of Hometown Health Plan and HHP Management Corporation, and Compliance Committee members;
- 3) Related Entities, as defined in Hometown.MPP.001, in the same manner and to the same extent as they apply to Hometown Health Plan; and
- 4) Delegated Subcontractors and Network Providers, as defined in Hometown.MPP.001, in the manner and to the extent set forth in Hometown Health Plan's policies and procedures.

Purpose:

The purpose of Hometown.CGP.005 is to set forth hiring, employment and contracting policies and procedures relating to Hometown Health Plan's Medicare Part D and MA Compliance Program. These Policies and Procedures supplement Renown Health's existing hiring, employment and contracting policies, as developed and maintained by Renown Health's Human Resources Department.

Policy:

The Renown Health policies and procedures governing Hiring and Employment (Renown.CCD.200 through Renown.CCD.230) are hereby incorporated into the Hometown Health Plan's Medicare Part D and MA Compliance Program. Accordingly, this policy must be read in conjunction with Renown.CCD.200 through Renown.CCD.230.

Procedures:

- 1) The Renown Health policies and procedures governing screening shall be supplemented as follows:

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- a) All new and existing Employees responsible for administering or delivering Part D and MA benefits shall be required to immediately disclose any debarment, exclusion, or other event that makes them ineligible to perform work related directly or indirectly to Federal health care programs.
 - b) In addition, Hometown Health Plan will screen all Employees, temporary employees, Board members, officers, volunteers, consultants, or First tier, Downstream or Related Entities against the entire Office of Inspector General ("OIG") LEIE exclusion list and EPLS exclusion list at www.sam.gov or most current web address at the time of hire or contracting. Thereafter, Hometown Health Plan will review the LEIE supplement file provided each month to ensure that such individuals or entities are not on the list.
 - c) Hometown Health Plan will require, via contract, that Delegated Subcontractors and Network Providers (1) review the OIG LEIE exclusion list and GSA EPLS exclusion list prior to the hiring or contracting of any new employee, temporary or permanent, Board members, volunteers or consultants and monthly thereafter, (2) promptly notify Hometown Health Plan if it determines that an individual or entity is on the list, (3) immediately remove any such individuals or entity from any work related, directly or indirectly, to Hometown Health Plan's MA or Part D plans, and (4) maintain documentation evidencing the screening of all relevant individuals or entities
- 2) If Hometown Health Plan discovers that any Employees, Board members, officers, Delegated Subcontractors, or Network Providers are on this list, such persons or entities will be immediately removed from any work related, directly or indirectly, to any federal health care programs.
 - 3) If Hometown Health Plan discovers any claims that were submitted for drugs that were prescribed by an excluded provider, Hometown Health Plan shall investigate to determine whether other claims have been submitted for items prescribed by the excluded provider and, as appropriate, report the claims to the MEDIC.

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Questions Related to Hometown.CGP.005 Policy and Procedure. Any questions concerning Hometown.CGP.005, or questions that are not specifically addressed by these policies, should be directed to the Hometown Health Plan Compliance Manager or the Renown Health Corporate Compliance Officer.

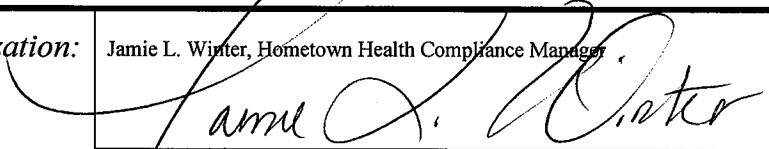
Audit and Documentation. Hometown Health Plan shall audit and document compliance with Hometown.CGP.005. Such audit shall be conducted pursuant to the procedures set forth in Renown.CCD.315 and Hometown.CGP.007. Relevant documentation shall be maintained in Hometown Health's Part D and MA Compliance Programs files, consistent with Hometown Health Plan's document retention policies.

References:

- Medicare Prescription Drug Benefit program regulations, 42 Code of Federal Regulations Part 423;
- Medicare Advantage program regulations, 42 Code of Federal Regulations Parts 422;
- Medicare Prescription Drug Benefit Manual, Ch. 9 (Compliance Program Guidelines); and
- Medicare Managed Care Manual, Ch. 21 (Compliance Program Guidelines)

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