WESTERN OREGON ADVANCED HEALTH, LLC

Compliance
and
Fraud, Waste and Abuse Handbook

2025

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OVERVIEW OF THIS HANDBOOK

Advanced Health's 2025 Compliance and Fraud, Waste and Abuse Handbook ("Handbook") serves as a compliance guide for our Board of Directors, employees, providers, subcontractors, and Members. The Handbook, and its referenced Policies and Procedures, provides a comprehensive discussion of our Compliance and Fraud, Waste and Abuse policies and procedures and Fraud Prevention Plan. The Policies and Procedures are referenced as endnotes.

The Handbook is intended as a guide for each employee's conduct so that Advanced Health may fulfill its obligations to observe the laws and public policies affecting its business and to deal fairly with the company's contracted provider facilities, contracted providers, Members, shareholders, employees, and the communities it serves. The Standards of Conduct ("Code") described in this Handbook are intended to define the scope of conduct that the Handbook covers. However, no set of standards or written rules can substitute for personal integrity, good judgement, and common sense required to meet the challenges of the daily work of Advanced Health's employees.

The Code described in this Handbook cannot, nor was it intended to, cover every situation which an Advanced Health employee may encounter. When the best course of action is unclear or if an Advanced Health employee observes a violation of these standards, employees are urged to seek the guidance of or report the violations to their supervisor[s], the Chief Compliance Officer, or an executive manager.

Failure to observe the provisions of the Handbook may result in serious consequences to the employee, such as termination from employment, and to Advanced Health and its affiliates, including criminal prosecutions, exclusion from federal programs, substantial monetary fines, and, of primary importance, the loss of our reputation for integrity.

This Handbook is a "living" document which will be revised annually to keep Advanced Health employees abreast of the most current information available on these topics. Advanced Health strives to improve and strengthen its compliance culture and appreciates employee feedback and contributions. If an Advanced Health employee has any thoughts about how we can improve our Compliance Program, please share them with Advanced Health's Internal Compliance Committee. This Handbook is provided to each employee upon hire and is available to all employees, subcontractors, providers, and members on our website.

WHAT IS COMPLIANCE?

An effective compliance program is often referred to as having seven elements, which are:

- Compliance Policies and Procedures.

- A designated Compliance Officer and Compliance Committee.
- Training and Education.
- Open Lines of Communication
- Internal Auditing and Monitoring
- Enforcement through Well-Publicized Disciplinary Measures.
- Responding Promptly to Detected Problems and Undertaking Corrective Action

However, one may have an exceptionally well-drafted compliance manual, but it is only as effective as the culture of the organization demands. Only by conducting our business in an honest, ethical, and legal manner can Advanced Health's reputation as a trusted and dependable community partner be maintained, and we rely on our employees, sub-contractors, and participating providers to promote an ethical culture.

Compliance is a very broad term that incorporates all applicable laws, without limitation, Fraud, Waste and Abuse (FWA), HIPAA Privacy and Security, the federal False Claims Act and Whistleblower protections, best practices, ethical practices and Advanced Health's Policies and Procedures. Advanced Health is committed to complying with not only the terms and conditions set forth in Sections 1-20 of Exhibit B, Part 9 of our 2024 Contract with OHA but also all other Contract provisions and applicable State and Federal laws.

Advanced Health operates in a highly regulated and continuously changing environment and is committed to enforcing its FWA Policies and Procedures, as well as all other applicable laws. To be successful, Advanced Health relies on its employees to remain informed of all job-related regulatory requirements, to seek clarification from supervisors if there is uncertainty, and to attend all in-service training and any other required compliance educational opportunities.

The primary role of Advanced Health's Compliance Program is to provide guidance and oversight which meets State and federal laws, rules, and regulations. This requires having methods of detection, prevention, and an effective response for any inappropriate or illegal conduct, including FWA. Advanced Health meets this challenge in several ways, including:

- Providing an on-going commitment to comply with all applicable laws;
- Demonstrating on-going ethical business practices and behaviors;
- Implementing effective controls and processes to ensure compliance with all regulatory requirements;
- Preventing, identifying, investigating, reporting, and correcting fraud, waste, and abuse;
- Having a culture of compliance which encourages employees to operate with integrity and communicate any concerns they may have regarding any potential non-compliant practices without fear of retaliation; and,
- Ensuring a consistent disciplinary approach to any identified non-compliant behavior or practice.

HOW DO WE MEET THE 7 ELEMENTS OF COMPLIANCE?

Compliance Policies and Procedures and Standards of Conduct

Policies and Procedures

Advanced Health has several policies, procedures, and handbooks related to compliance. These policies, procedures, and handbooks are referenced as endnotes throughout the Manual and are available in our document management system for every employee to review. They serve as detailed guides to our Compliance and FWA Program.

Standards of Conduct

In 2019, Advanced Health adopted a network-wide Standards of Conduct ("Code" or "Standards"). The purpose of the Code is to reinforce Advanced Health's values and to serve as a guide for moral, ethical, and legal behavior. Adherence to the Code promotes Advanced Health's reputation for integrity and honesty in the community and ensures that Advanced Health is compliant with applicable laws. The Standards are as follows:

PROFESSIONALISM AT ALL TIMES

To continue building upon our foundation as a trusted and faithful administrator of the Oregon Health Plan, we must be steadfast in our commitment to Advanced Health's philosophy of service, honoring commitments, displaying honesty and integrity, and achieving the company's goals solely though honorable and ethical conduct. In any business, ethical behavior does not simply happen, it is the product of clear and directly communicated behavioral expectations, modeled from the top and demonstrated by example.

ABIDE BY THE CODE AND APPLICABLE LAWS, REGULATIONS, POLICIES AND PROCEDURES

Being a duly recognized Coordinated Care Organization (CCO) and overseeing an extensive Provider Network for Coos and Curry counties is an enormous responsibility. If each of us abides by this Code and the laws, rules, regulations, policies, and procedures that apply to us, we will do our part to see that Advanced Health operates with integrity. If you have questions about the legality or appropriateness of a situation, ask your supervisor or the Chief Compliance Officer for clarification.

HONOR MEMBERS' RIGHTS

We have an ethical responsibility to make sure our Members receive care in accordance with the quadruple aim, and that they are treated respectfully and with dignity. In addition to ethical responsibility, we have a legal responsibility to comply with all applicable laws and regulations related to Members' rights. We must also comply with Advanced Health policies, including, but not limited to, policies regarding utilization management, advance directives, care coordination, and seclusion and restraint. [1,2,3]

ENSURING MEMBERS RECEIVE QUALITY CARE

As a CCO, we are dedicated to ensuring that our Members receive a high quality of care. Quality assurance and performance improvement is a promise we deliver every day in every aspect of our work. In this spirit, we are committed to following all applicable policies, laws, and licensing/credentialing requirements related to quality of care and Member safety. We make sure that our contracted providers and facilities uphold professional standards of care and engage in quality improvement activities. [4]

COMPLIANCE WITH THE QUADRUPLE AIM

As a CCO and, more importantly, as stewards and ethical leaders within our communities, Advanced Health is committed to each of the four pillars of the quadruple aim:

- *Population Health*— By collaborating with employees, Members, physicians, partner organizations, and other stakeholders, Advanced Health is a thought leader in identifying ways to improve the health of the populations we serve;
- *Enhancing Experience*— Through educating and training our employees and contracted entities, and by seeking opportunities to contract with physicians, facilities, and community partners who share in Advanced Health's mission and passion, Advanced Health is dedicated to enhancing the experience of care for Members;
- *Reducing Cost*—Through integration and shared services, Advanced Health endeavors to find opportunities to reduce the per capita cost of health care; and,
- *Health Equity*— Better understanding health disparities is critical to ensuring our Members receive the care that they need, at a level they deserve. Advanced Health employees and contracted entities are expected to contribute towards to not only our growing understanding of what health disparities look like in the communities, but also in developing strategies for overcoming health disparities in Coos and Curry county, and the state of Oregon.

PRESERVE CONFIDENTIALITY AND INFORMATION SECURITY

Protecting confidential information is a priority. Confidential information includes health information about our patients, information in employee records, and proprietary information about Advanced Health. We access confidential information and share it with others only when authorized to do so and for the purpose of doing our job. We follow applicable laws and policies when releasing confidential information and report concerns to appropriate parties. We investigate and report breaches of patient information and take steps to secure our systems from unauthorized access and comply with security policies. [5]

USE SOCIAL MEDIA AND TECHNOLOGY

Advanced Health encourages an online and social media culture that complies with the law, internal policies, procedures, and ethical values. Advanced Health employees may not disclose confidential or proprietary information about Advanced Health, its Members, or its employees on social media (including, but not limited to, communications over the Internet, on personal

websites or webpages, or in online communities). We do not take or transmit photographs or recordings of Members, visitors, or staff in the workplace except as permitted by our policies. Any questions concerning the appropriate use of social media and technology should be directed, as applicable, to Human Resources, the HIPAA Security Officer or the IT department.

SUPPORT DIVERSITY AND INCLUSION

Advanced Health supports a culture of diversity and inclusion. We treat everyone with respect. We do not tolerate discrimination, in any form, against anyone at Advanced Health, including visitors, Members, and employees. We do not tolerate conduct that is disrespectful, hostile, intimidating, or harassing.

WORK SAFELY

The health, safety and well-being of our Members and employees is an Advanced Health priority. We comply with workplace health and safety laws and report safety concerns to the Safety Officer in accordance with internal guidance and procedures. We maintain a work environment free from violence and unsafe behavior.

COMPETE FAIRLY

Advanced Health is committed to antitrust compliance and fair competition. We do not make unlawful agreements with competitors about prices or charges, the services we pay for, or who we contract with for services. We do not discuss related matters, such as capitated and non-capitated arrangements, subcontracted entities, costs, salaries, data analytics, or survey results with those outside of Advanced Health, unless obligated under Advanced Health's core contract with the Oregon Health Authority, or as required by State or federal law.

RECORD AND REPORT INFORMATION ACCURATELY

We keep accurate records about our Members, our employees, our contracted providers, our contracted clinics, subcontractors, and all financial transactions. It is the responsibility of each of us, when engaged in recordkeeping on behalf of Advanced Health (including employee timecards, medical records, and claims), to be accurate and honest. For example:

- We do not sign another person's name to documents or share each other's passwords;
- We amend the medical record only in accordance with Advanced Health policy and applicable law; and,
- Our financial records conform to applicable accounting principles. We retain documents for the length of time described in our document retention policies.

MANAGE AND ADJUDICATE CLAIMS APPROPRIATELY

We review and adjudicate payment of services with integrity to avoid FWA. All Advanced Health employees and contracted providers, facilities and subcontractors are expected to comply with federal healthcare program requirements, including, but not limited to, Medicare/Medicaid rules and federal and state False Claims Acts.

We pay only for medically necessary services rendered by eligible providers, and which are properly documented and coded. Our claims and customer service departments respond to questions concerning charges in an accurate and timely manner. We collaborate with providers to correct billing errors and require repayment of any identified overpayments within sixty calendar days from the date the overpayment was identified. We notify OHA of any recoveries made following guidelines provided in the core contract, through internally developed processes.

If you become aware of inaccuracies, notify your supervisor so that the error can be corrected. If you see problems related to balance billing or identify any trend which may be due to improper billing behavior by a provider or subcontractor, contact the Chief Compliance Officer, or follow other acceptable methods of concern submissions as can be found in Advanced Health compliance policies, or in the section on reporting violations in this Handbook.

DO NOT DO BUSINESS WITH EXCLUDED INDIVIDUALS OR ENTITIES

We expect all individuals and entities associated with Advanced Health to be appropriately credentialed, licensed and otherwise qualified to perform their duties. Advanced Health does not do business with, employ, or pay for services rendered by individuals or entities that are excluded or ineligible to participate in federal healthcare programs. Advanced Health employees, contractors, and third-party vendors have a responsibility to report to their supervisor, the HR Generalist, or the Chief Compliance Officer if they are excluded, debarred, or otherwise ineligible to participate in healthcare programs.[6]

COOPERATE WITH INQUIRIES, AUDITS, AND INVESTIGATIONS

We cooperate with inquiries from duly recognized State and federal authorities, authorized third-party organizations operating on behalf of duly recognized State or federal authorities, as well as with internal and external audits and investigations. When receiving non-routine requests, we may consult with legal counsel, the compliance department, and executive management to ensure that requests are managed properly. We are truthful in what we say. We never alter or destroy records in violation of the law or Advanced Health policy.

USE RESOURCES RESPONSIBLY

We use Advanced Health resources responsibly for Advanced Health business purposes, not for personal gain. We spend Advanced Health funds wisely, eliminating waste, and control operational costs without compromising Member access or quality of care. We use physical assets like computers, machinery, and workspace for Advanced Health business, and we protect those assets from loss, damage, and theft. We do not waste supplies, equipment, space, or time. We protect intellectual property and respect patents, software licensing, and copyright.

CONDUCT FUNDRAISING APPROPRIATELY

Advanced Health respects employees' and subcontractor rights to participate in or refrain from political and fundraising activities on personal time. Employees must follow applicable guidance relating to the use of Advanced Health resources for political activity, engagement in political activity while at work, and similar issues. Employees may not inappropriately force, direct, or

encourage coworkers to support or contribute to a political cause, candidate, or party in violation of the law, applicable guidance.

DISCLOSE AND APPROPRIATELY MANAGE CONFLICTS OF INTEREST

We disclose and appropriately manage conflicts of interest. Employees must report any actual or potential conflict of interest. Conflicts of interest are situations in which personal considerations may affect, or have the appearance of affecting, our loyalty and ability to fulfill our responsibilities to Advanced Health, OHA, and our Members. Depending on the circumstances, a "conflict of interest" might include: employment outside of Advanced Health with a competitor or in violation of our policies; supervising a close relative; accepting gifts from a vendor, Member, or provider; or, causing Advanced Health to contract with vendors with whom you have a personal or financial interest. If you have questions about what might be a conflict of interest, review Advanced Health policies, and speak with your supervisor or the Chief Compliance Officer.[7]

PROHIBIT BRIBES, KICKBACKS, OR PAYMENT FOR REFERRALS

We do not offer or accept bribes or kickbacks. Bribes and kickbacks are money, gifts, or special treatment given to someone in exchange for a favor. The favor may be many things, from a promise to make Provider panel adjustments to a promise to use a vendor's product.

As a highly complex area of the law, employees must take special care and promptly refer any questions to the Chief Compliance Officer or Executive Manager, who will work with legal counsel to respond appropriately.

PROHIBIT CERTIAN MARKETING AND INDUCEMENTS AFFECTING MEMBER CHOICE OF PLAN AND PROVIDER

Federal law prohibits Advanced Health, its employees, and contracted providers from engaging in marketing practices which could affect a Member's, or potential Member's, choice when selecting an OHP administrator, or decision about where to seek care. As this is a highly complex area of the law, employees and subcontractors must take special care and promptly relay questions to the Chief Compliance Officer.

REPORT COMPLIANCE CONCERNS WITHOUT FEAR OF RETALIATION

Employees are encouraged to contact their supervisor or Chief Compliance Officer whenever they need clarification or directions regarding compliance issues (including this Code). Employees are required to report suspected violations of the Code, policies, procedures, law, and regulations to a supervisor or any executive or program manager or the Chief Compliance Officer, or through the intranet or submission box. Retaliation is not permitted against anyone who seeks advice, raises a concern, or reports misconduct in good faith. Such retaliation should be reported immediately to the Compliance Officer or HR Manager. [8,9]

A designated Compliance Officer and Compliance Committee

Advanced Health's Chief Compliance Officer is Michael Hale, JD, BSN, CHC, CHPC. The Chief Compliance Officer reports directly to Advanced Health's CEO, Ben Messner, and the Board of Directors, and is primarily responsible for developing and implementing written policies and procedures regarding FWA, creating the annual FWA annual prevention plan, and over-seeing our dedicated Compliance Department.[10] Everyone is encouraged to contact the Chief Compliance Officer for clarification or direction regarding this Handbook and associated policies and procedures. Additionally, supervisors may be contacted for assistance with questions about the Code. Please contact the Chief Compliance Officer with unresolved questions and concerns about the Code, compliance, and FWA.

Michael Hale, JD, BSN, CHC, CHPC
Chief Compliance Officer
Advanced Health
289 LaClair St.
Coos Bay, OR 97420
(Phone) 541-266-6513
mike.hale@advancedhealth.com

Advanced Health has two Regulatory Compliance Committees:

- Board of Directors Regulatory Compliance Committee

A compliance program's ability to be effective is partially dependent upon the systems that are put in place to ensure organizational transparency and employee accountability. To be successful requires active involvement by, and open lines of communication between, Advanced Health and its Board of Directors ("Board"). Accordingly, Advanced Health has created a Regulatory Compliance Committee comprised of at least the Chief Executive Officer, Chief Compliance Officer, and two Board appointed members. In the absence of assigned Board members, the entire Board of Directors shall serve as the Regulatory Compliance Committee. The Regulatory Compliance Committee is responsible for oversight of Advanced Health's FWA prevention program and compliance with the terms and conditions of our CCO Contract with OHA.[11]

- Internal Regulatory Compliance Committee

In addition to the Regulatory Compliance Committee at the Board of Director's level, Advanced Health has also established an Internal Compliance Committee. The Internal Compliance Committee includes the Chief Compliance Officer, Chief Information Officer, Privacy Officer, HR Manager, and others ad hoc. The role of the Internal Compliance Committee is to help develop compliance related policies and procedures, develop, and implement our FWA Plan,

identify and negate compliance risks, and respond, investigate, and report, as applicable, all compliance matters brought to the attention of Advanced Health.[12]

Training and Education

Employees are expected to participate in any training and education offered by Advanced Health and by various professional groups and associations, where appropriate, and be familiar with the laws governing their specific job functions. These include, but are not limited to:

- Compliance orientation for new employees.
- This Handbook and associated policies and procedures.
- All-staff training.
- Intradepartmental training.
- Job specific credentialing training.

In additional, all Advanced Health employees, including the Chief Compliance Officer and senior management (including the Board of Directors) are required to attend mandatory training, upon hire and at least annually thereafter, on the right, pursuant to Section 1902(a)(68) of the Social Security Act, to be protected as a whistleblower for reporting any suspected FWA, information necessary for our employees, Subcontractors, and Participating Providers to fully comply with the FWA requirements of the CCO Contract, and Oregon Medicaid specific referral and reporting information, including time parameters required for compliance with Exhibit B, Part 9 of the CCO Contract.. [13,14,14]

Advanced Health Board members are trained upon initial appointments to Board during Board Member Orientation, and all Board members are trained annually. Advanced Health's Subcontractors are sent a copy of our FWA Handbook annually and as updated, if applicable, and are asked to review and acknowledge that they have been reviewed. Network Providers receive FWA Training initially along with provider orientation for newly contracted providers, and all network providers receive such training at least annually. Such training is provided through a variety of methods including power-pointe presentations, newsletters and access to our website materials, which are also available to the general public. All contracted network providers receive a copy of the most recent OHA approved FWA Handbook and Whistle-blower Policy and Procedure at each initial and annual training.

Open Lines of Communication

Reporting

Advanced Health prides itself on the ethical culture of its employees and contractors and strives to promote and encourage open lines of communication. Each employee has the responsibility to report any actions that he/she believes, in good faith, may violate State or federal laws and regulations, our CC0 Contract, our policies and procedures, good business practices and ethical conduct. This communication is through the process of reporting. Reports

can be made in-person, in writing, or via anonymous reporting processes.[15] Our Members also have the ability to report concerns anonymously.[16]

Federal and State law prohibits employers from discriminating or harassing employees because of their good faith disclosure of information about a violation of a law or rule, including reporting any potential or suspected (or both) FWA. This is referred to as **Whistleblower Protection**. Advanced Health has a strict no-retaliation policy against those who report violations and assures its employees that senior management will protect those who report concerns. Employees who have knowledge of retribution or retaliation due to the reporting a concern should promptly report the information to Advanced Health's Chief Compliance Officer, Chief Executive Officer, or HR Generalist.[17,18]

Executive and non-executive officers whom employees may contact for compliance matters include:

Name & Title	**Compliance Matters**
Michael Hale Chief Compliance Officer 541-266—6513 (office) mike.hale@advancedhealth.com cco.compliance@advancedhealth.com	CCO Contract, Compliance, State, and federal laws and regulations, HIPAA Privacy
Erica Tesdahl-Hubbard Chief Information Officer/HIPAA Privacy and Security Officer 541-266-6503 (office) erica.hubbard@advancedhealth.com	HIPAA Privacy and Security, Compliance
Ben Messner Chief Executive Officer 541-269-4566 (office) ben.messner@advancedhealth.com	Operations, Board of Directors, Compliance
Shena Holliday HR Manager 541-269-3215 (office) shena.holliday@advancedhealth.com	Human Resources, Compliance
Marla Smith Compliance Manager 541-266-6526 marla.smith@advancedhealth.com	Auditing and Monitoring, Compliance

Chindanu Ozuah
Sr. Compliance Specialist
541-266-6542
Chindanu.Ozuah@advancedhealth.com

Member Services
541-269-2052

This list is not all-inclusive. Advanced Health maintains an open-door policy, and employees may also contact any executive or program manager regarding compliance concerns. If an Advanced Health employee has concerns about improper actions of other Advanced Health employees, the employee should contact either his or her supervisor, the HR Generalist, the Chief Compliance Officer, or the Chief Executive Officer. Employees may also contact the following State agencies for allegations of fraud or abuse:

Medicaid Fraud Control Unit (MFCU)
Oregon Department of Justice
100 SW Market Street
Portland, OR 97201.
Phone 971-673-1880
Fax 971-673-1890
Secure email: Medicaid.Fraud.Referral@doj.state.or.us

OHA Office of Program Integrity (OPI)
500 Summer St. NE, E36
Salem OR 97301
Secure email: OPI.Referrals@oha.oregon.gov
Hotline 1-888-FRAUD01 (888-372-8301)
https://www.oregon.gov/oha/FOD/PIAU/Pages/Report-Fraud.aspx

To Report a Case of Fraud or Abuse by a Member:
ODHS Fraud Investigation
PO Box 14150, Salem, OR 97309.
Hotline 1-888-FRAUD01 (888-372-8301)
Fax: 503-373-1525 Attn: Hotline.
https://www.oregon.gov/odhs/financial-recovery /Pages/ fraud.aspx

Anonymous Reporting

Advanced Health also offers several ways to anonymously report. These are:

Contacting the Chief Compliance Officer by phone, e-mail, or first-class mail.

Michael Hale, JD, BSN, CHC

Chief Compliance Officer
Advanced Health
289 LaClair St.
Coos Bay, OR 97420
541-266-6513
mike.hale@advancedhealth.com or cco.compliance@advancedhealth.com

Anonymous Reporting Box

A locked box that is clearly marked and located in the main hallway on the first floor of Advanced Health's office building. Please note that because of COVID-19, and the subsequent requirements for most of our employees to work remotely, the most effective means of anonymous reporting, at this time, is through the intranet, as described below.

Advanced Health's Intranet

Located on the Intranet under "Compliance Concerns."

Confidential Compliance Hotline

(Phone) 541-266-6500

Mandatory Reporting of FWA

Advanced Health reports quarterly and annually a summary of all FWA referrals and cases investigated. In addition, Advanced Health reports all suspected cases of FWA that meet specific characteristics, including suspected Fraud committed by its employees, providers, subcontractors, members, or any other third parties to the OPI and MFCU. Such reporting is made promptly but in no event more than seven (7) days after we are initially made aware of the suspicious case, regardless of our own suspicions or lack thereof. Advanced Health also self-reports all identified over-payments made by OHA as well as overpayments made by Advanced Health to its providers and subcontractors.[19]

Advanced Health and its Subcontractors are required to use OHA's FWA Referral Form, which is available on OHA's website. Individual whistleblowers or any other person(s) who make a report of suspected Fraud, Waste, Abuse, or non-compliance to Advanced Health, or its Subcontractors, are not required to use the FWA Referral Form or be required to include identifying information in their anonymous reports. All anonymous FWA reporting will be accepted by Advanced Health, Subcontractors, and Participating Providers.[20]

Some of the specific characteristics referenced above include intentionally or recklessly reporting overstated or up coded levels of service; altered, falsified, or destroyed clinical records;

and knowingly charging members for services that are covered. A complete list of the designated characteristics may be found in our *Compliance Training, Reporting, and Response Policies and Procedures*.

Advanced Health cooperates in good faith with OPI, MFCU and/or any other governmental entity during any FWA investigation and does not communicate with the party being investigated about the report or investigation.[21] Advanced Health also immediately reports to the OIG any providers who are identified as being on the List of Excluded Individuals,[22] reports to OHA any changes in an enrollee's circumstances that may impact eligibility [23], and changes in a provider's or subcontractor's circumstances that may impact their eligibility to provide services on our behalf.[24]

Auditing and Monitoring

Advanced Health conducts and is a participant of compliance monitoring and auditing processes of itself and its subcontractors. Our auditing and monitoring are in accordance with an annual auditing plan and includes program integrity audits[25], audits for overpayments or underpayments[26], and verification of services with Members[27]. Under all circumstances, the person(s) or entity conducting the monitoring or auditing process is expected to maintain a high-level of objectivity. In fact, our CCO Contract requires us to employ or contract with a minimum number of full-time equivalents of dedicated auditors or investigators based on the maximum enrollment limit of our Members.[28] While these processes are primarily for determining whether we meet a high standard of compliance with contractual requirements, State and federal regulations, and best practices, they also assist in risk identification and process improvement. Therefore, it is important that regardless of whether the auditing or monitoring activities are being conducted by an Advanced Health employee, or by an outside entity, employees must always be transparent, open, and honest. Advanced Health reports to OHA, quarterly and annually, all Program Integrity audits performed.[29]

Enforcement through Well-Publicized Disciplinary Measures

Advanced Health expects its employees and any person or entity it contracts with, including its Participating Providers and Subcontractors, to always meet, and maintain, a high standard of compliance. As such, it is only through the enforcement of our policies, and the equality and consistency with which we hold our employees accountable to compliance, that Advanced Health is able to fulfill its' mission of "Bridging the Future of Healthcare."

Enforcement can be implemented through, but is not limited to, corrective action, informal or formal discussions, training and re-training, or other educational sessions. OHA also has the right to suspend payments made to Advanced Health in the event a credible allegation of fraud has been made against Advanced Health and may also direct Advanced Health to suspend payments to its Subcontractor in the event of a credible allegation of fraud against its

Subcontractors[30] Any such suspension of payments may be temporary, and OHA also has the right to forego suspension and continue making payments, or refrain from directing Advanced Health to suspend payments to its Subcontractors if certain good cause exceptions exist. In the event OHA determines a credible allegation of fraud has been made against a Subcontractor, Advanced Health shall cooperate with OHA to determine if payments shall be suspended by Advanced Health to the Subcontractor or whether good cause exists not to suspend such payments.

Employee disciplinary actions are detailed in the *Employee Handbook* but depending on circumstances can be as minor as an employee being asked to do/not do a specific action, or as severe as the termination and reporting to licensing boards and State and federal authorities.[31, 32] Enforcement of our Standards of Conduct for sub-contractors and Participating Providers is achieved through routine auditing and monitoring and, if issues are identified, through corrective action plans and/or contract revisions, up to and including contract termination.[33] Our Compliance and FWA Handbook is available on our website for easy access by any interested party.

Responding Promptly to Detected Problems and Undertaking Corrective Action

Advanced Health responds promptly to all allegations or identification of compliance violations, including FWA. In most instances, an investigation is initiated within one (1) business day following identification of the potential issue, and in no event longer than seven (7) business days. In addition, Advanced Health reports all suspected cases of FWA to the MFCU and OPI no more than seven (7) days after becoming aware of a suspected case, regardless of our own suspicions or lack thereof that violation has occurred. If an internal or external investigation results in findings that a violation has occurred, the organization against whom the finding exists is required to submit a corrective action plan which is monitored until the violation no longer exists. Advanced Health also retains the discretion to terminate contracts, if warranted. Instances of employee misconduct are referred to the Human Resources Department for appropriate actions.[34]

[1] *Advanced Health's Member Handbook.*
[2] *Member Grievance System Policies and Procedures*
[3] *Member Rights Policies and Procedures.*
[4] *Credentialing Policies and Procedures.*
[5] *Advanced Health's HIPAA Privacy Manual.*
[6] *Credentialing Policies and Procedures.*
[7] *Advanced Health's Conflicts of Interest and Program Integrity Policies and Procedures.*
[8] *Advanced Health's Deficit Reduction Act of 2005, False Claims Act, Whistleblower Protection and Similar Laws Policy Statement.*
[9] *Advanced Health's Compliance Training, Reporting and Response Policies and Procedures.*
[10] *Advanced Health's Conflicts of Interest and Program Integrity Policies and Procedures.*
[11] *Advanced Health's Conflicts of Interest and Program Integrity Policies and Procedures.*
[12] *Advanced Health's Compliance Organizational Chart.*
[13] *Advanced Health's Employee Handbook.*
[14] *Compliance Training, Reporting and Response Policies and Procedures.*
[15] *Compliance Training, Reporting and Response Policies and Procedures.*
[16] *Advanced Health's Member Handbook.*
[17] *Advanced Health's Deficit Reduction Act of 2005, False Claims Act, Whistleblower Protection and Similar Laws Policy Statement*
[18] *Advanced Health's Employee Handbook.*
[19] *Overpayment, Recovery and Reporting Policies and Procedures.*
[20] *Compliance Training, Reporting and Response Policies and Procedures.*
[21] *Compliance Training, Reporting and Response Policies and Procedures.*
[22] *Advanced Health's Credentialing Policies and Procedures.*
[23] *Advanced Health's Member Enrollment and Disenrollment Policies and Procedures.*
[24] *Advanced Health's Credentialing Policies and Procedures.*
[25] *Provider Post-Payment Integrity Review Policies and Procedures.*
[26] *Overpayment, Recovery and Reporting Policies and Procedures.*
[27] *Member Service Verification Letter Policies and Procedure*
[28] *Advanced Health's Conflicts of Interest and Program Integrity Policies and Procedures.*
[29] *Compliance Training, Reporting and Response Policies and Procedures.*
[30] *Advanced Health's Compliance Training, Reporting and Response Policies and Procedures.*
[31] *Advanced Health's Employee Handbook*.
[32] *Advanced Health's Conflicts of Interest and Program Integrity Policies and Procedures.*
[33] *Advanced Health's Contracting Policies and Procedures Manual.*
[34] *Advanced Health's Compliance Training, Reporting and Response Policies and Procedures.*