



Embracing a Culture of Compliance

2020 Hearing Care Network LLC
March 2022

Welcome

Welcome to the 2020 training on Embracing a Culture of Compliance



Learning Objectives

Upon successful completion of this training module you will be able to:

- Explain our culture of compliance.
- Outline the seven (7) elements of an effective compliance program.
- Recognize the high risk areas of non-compliance in the healthcare industry.
- Describe the consequences of non-compliance.
- Describe how to appropriately escalate any concern related to potential issues of non-compliance.

Our Goal

This training will help you understand the role and responsibilities of the Corporate Compliance Department and where you fit in.

You are an integral part of the 2020 EyeCare Plan/Hearing Plan Network Corporate Compliance Program.



Who are you?

When we say “You” in this training, who do we mean?

You are any 2020 EyeCare Plan/Hearing Plan Network:

- Associate, employee, executive or staff member
- Contingent workforce member, part-time contractor or volunteer
- Board of Directors or Committee member.

Why?

Why do we need to implement an effective compliance program?



The Centers for Medicare and Medicaid Services (CMS) and state and federal regulations require all plan contractors and plan sponsors to implement an effective Compliance Program!

But even more important, we have a Compliance Program to protect and serve 2020 plan members.

An effective Compliance Program should include the following requirements.

Requirement
#1

Requirement
#2

Requirement
#3

Why do we need an effective Compliance Program?

Requirement
#1



Provide guidance on how to identify and report compliance violations.

Why do we need an effective Compliance Program?



Requirement
#2



Provide guidance on how to handle compliance questions and concerns.

Why do we need an effective Compliance Program?



Requirement
#3



Articulate and demonstrate our commitment to legal and ethical conduct.

A Culture of Compliance

A culture of compliance within our organization prevents non-compliance, detects non-compliance and corrects non-compliance.



**Detects
Non-Compliance**

**Prevents
Non-Compliance**

**Corrects
Non-Compliance**

The 7 Elements of an Effective Compliance Program.

Understanding the basics.

Non-compliance can cause harm!

Without programs to prevent, detect, and correct non-compliance, our Members may be at risk.

As a result of non-compliance or fraud, waste and abuse, Members may:

- Have benefits denied.
- Experience a delay in receiving services.
- Experience difficulties using the providers of their choice.
- Have to climb unnecessary hurdles to get care.

An effective compliance program is critical to ensuring Members receive quality and timely health care. The following slides will outline the required elements of an effective compliance program.

7 Elements of an Effective Compliance Program

At a minimum, a compliance program must include 7 core elements.

These elements include:

- Written policies, procedures and a Code of Ethics.
- Designation of a Compliance Officer.
- A Compliance Committee.
- Effective training and education.
- Effective lines of communication.
- Well-publicized disciplinary standards.
- Procedures and systems for routine monitoring and auditing of risks and prompt response to compliance issues.



7 Elements of an Effective Compliance Program

Element #1 – Written policies, procedures and a Code of Ethics.

2020 EyeCare has developed written policies, procedures and a Code of Ethics and Standards of Conduct (the “Code”) that outlines standards supporting the Compliance Program.

- Articulate the organization’s commitment to comply with all applicable requirements and standards under the contract, and all applicable federal and state requirements.
- Describe compliance expectations as embodied in the Code of Ethics and Standards of Conduct.
- Implement the operation of the Compliance Program.
- Provide guidance to associates and others on dealing with suspected, detected or reported compliance issues.
- Identify how to escalate and report potential issues of non-compliance.
- Describe how suspected, detected or reported compliance issues are investigated and resolved by the Company.
- Include a policy of non-intimidation and non-retaliation for good faith reporting of suspected non-compliance.

7 Elements of an Effective Compliance Program

Element #2 – Designation of a Compliance Executive.

Element #3 – Compliance Committee.

A Corporate Compliance Committee that reports to the Board of Directors

7 Elements of an Effective Compliance Program

Element #4 – Effective Training and Education.

Compliance training should include information on the Compliance Program, laws related to the Medicare and Medicaid programs, and preventing, detecting and reporting of fraud, waste and abuse. **Trainings must be completed:**

- By associates, contingent workforce members, board of director or committee members upon hire and annually thereafter.
- You **MUST** complete the training within the allotted time or risk non-compliance with the Code of 2020 and the Corporate Compliance Program.

7 Elements of an Effective Compliance Program

Element #5 – Effective Lines of Communication.

Any associate, contingent workforce member, provider or any employee of a FDR may bring concerns directly to the Compliance Committee or alternatively email your Privacy Officer at:

Device@2020eyecareplan.com

REMEMBER: Reporting is safe! No individual will suffer retribution for good faith, truthful and prompt reporting of suspected instances of non-compliance. We encourage you to report your concerns.

7 Elements of an Effective Compliance Program

Element #6 – Well-Publicized Disciplinary Standards.

2020 expects you to comply by:

Do the right thing...even when nobody is looking. Integrity begins with you.

What does this mean?

Non-compliant conduct may result in corrective action, up to and including termination.

The type of corrective action imposed may be based on the **nature, severity and frequency of the violation.**

Disciplinary action will always be applied in a fair, equitable and consistent manner.

7 Elements of an Effective Compliance Program

Element #7 – Procedures and Systems for Routine Monitoring and Auditing of Risks and Prompt Responses to Compliance Issues.

Areas of concern are investigated and addressed in a variety of ways including the issuance of corrective or remedial actions.

You can be confident any matter you report will be investigated thoroughly and confidentially.

Understanding Non-Compliance and Reporting.

Our commitment to ethical business behavior.

Our Commitment to Ethical Business Behavior

How do we prevent non-compliance, including fraud, waste and abuse?

As part of the community serving Medicare Beneficiaries and Medicaid Enrollees, it is important you conduct yourself in an ethical and legal manner. Remember...

Do the right thing...even when nobody is looking. Integrity begins with you.



Our Commitment to Ethical Business Behavior

Do the right thing...even when nobody is looking. Integrity begins with you.

Always consider the following:

- Act fairly and honestly.
- Comply with the letter and the spirit of the law.
- Report suspected violations.
- Adhere to high ethical standards in all that you do.

Non-Compliance Indicators

What is non-compliance?

Non-compliance is conduct that does not:

- conform to rules and regulations applicable to state and federal health care programs;
- conform to 2020 policies and procedures; or
- conform to the 2020 Code of Ethics and Standards of Conduct.



Non-Compliance Indicators

Areas of high risk.

Non-compliance can occur any where. In the healthcare industry there are 12 areas of high risk. *If you work in any of these areas you have a responsibility to be more diligent in your effort to prevent, detect and report non-compliance.*

- Appeals and grievance processing
- Network adequacy
- Marketing and member communications
- Timely claims payment requirements
- Privacy and security
- Formulary administration
- Encounters
- Credentialing
- Quality of care
- Ethics
- Beneficiary notices
- State and Federal contract requirements

Reporting Non-Compliance or Fraud, Waste and Abuse

How do I report?

I'm afraid to report non-compliance!



There can be no retaliation against you for reporting suspected non-compliance in good faith.

2020 offers reporting methods that are: Confidential, Anonymous and Non-Retaliatory.

Reporting Non-Compliance or Fraud, Waste and Abuse

Information to Report.

What happens if you are non-compliant?

As an organization serving Medicare Beneficiaries and Medicaid Enrollees, 2020 is required to have disciplinary standards and corrective action for non-compliant behavior. If you are non-compliant you may be subject to:

- Mandatory training or re-training.
- Disciplinary and Corrective Action.
- Termination.

Reporting Non-Compliance or Fraud, Waste and Abuse

Information to Report.

Compliance is EVERYONE'S responsibility!

Prevent

Operate according to 2020's ethics expectations and adhere to its policies, procedures and Code of Ethics and Standards of Conduct!

Detect & Report

If you DETECT or SUSPECT potential non-compliance, REPORT it immediately!

Correct

Promptly CORRECT non-compliance to protect beneficiaries and enrollees in all we do!

Reporting Non-Compliance or Fraud, Waste and Abuse

How do you report potential non-compliance?

- Talk to your manager or supervisor
- See your Compliance Executive or Privacy Officer
- Email Corporate Compliance at Device@2020eyecareplan.com
- Call the Compliance Hotline to report compliance, ethics or privacy concerns
Toll free: 877 673 4177
- Call the Fraud Tip Line to report suspected or known fraud, waste and abuse concerns
Toll free: 877 673 4177

Reporting Non-Compliance or Fraud, Waste and Abuse

What happens next?

After you report an issue the incident will be timely investigated. Steps will be taken to correct incidences of non-compliance.

Correcting non-compliance:

- Avoids reoccurrence of the issue.
- Promotes efficiency and effective internal controls.
- Protects those we serve.
- Ensures on-going compliance with CMS federal and state program requirements.

Reporting Non-Compliance or Fraud, Waste and Abuse

How do you know it won't happen again?

Once non-compliance is **detected** and **corrected**, a formal validation that the corrective action has fixed the issue will take place.

Monitoring and auditing activities will confirm ongoing compliance and prevent further non-compliance.



The End

Thank you for participating in “Embracing a Culture of Compliance” training module. This concludes the training.

Assessment.

Embracing a Culture of Compliance with Assessment

Assessment

CMS and _____ require plan sponsors, including 2020, implement an effective Compliance Program.

- State and federal regulations
- Medicare Beneficiaries and Medicaid Enrollees
- 2020 Human Resources Department
- 2020 Corporate Compliance Department

Assessment

Who must take this training?

- CMS and state and federal employees
- Medicare Beneficiaries and Medicaid Enrollees
- 2020 associates only
- 2020 associates, contingent workforce members, First-Tier, Downstream or Related Entities (FDR), Corporate Compliance Department, Board of Directors and Committee Members.

Assessment

A culture of compliance _____ non-compliance.

- encourages
- Prevents, detects, and corrects
- Provides excessive rules to help mitigate
- Streamlines business practices to avoid audits

Assessment

In the healthcare industry there are 12 areas of high risk. If you work in any of these areas it is not your responsibility to prevent, detect and report non-compliance.

True

False

Assessment

How can you be compliant? (Fill in the blanks with the correct words from the right column)

Act _____ and honestly.

ethical standards

violations

Comply with the _____ of the law.

fairly

letter and spirit

Adhere to high _____ in all you do.

Report suspected _____.

Assessment

Which of the following is NOT one of the 7 elements of an effective Compliance Program?

- Written policies and procedures and Code of Ethics
- Designation of a Compliance Officer
- Compliance Committee
- Effective training and education
- Designation of associates, contingent workforce and FDRs who are hired to perform services on behalf of 2020
- Effective lines of communication
- Well-publicized disciplinary standards
- Procedures and systems for routine monitoring and auditing of risks and prompt responses to compliance issues

Assessment

If you are non-compliant you may be subject to _____.

- mandatory training or re-training, disciplinary and corrective action or termination
- validation that the corrective action has fixed the issue
- monitoring and auditing activities to confirm ongoing compliance

Assessment

There can be _____ against you for reporting suspected non-compliance in good faith.

- NO retaliation
- retaliation
- an investigation
- disciplinary action

Assessment

How do you report non-compliance?

- Contact your local police, email your vendor relations manager, contact member and provider services, or call the Action News Tip line.
- Call the service desk, talk to Human Resources, email Security, or go the Corporate Compliance SharePoint site for more information.
- Talk to your manager or supervisor, see your Chief Compliance Officer or Corporate Compliance Director in person, make a report through email to the Corporate Compliance Department, use the online intake form located on the Corporate Compliance SharePoint, or call the Compliance or Fraud tip Hotline.

Assessment

Once non-compliance is detected what happens next? (Place the below statements in the correct order.)

- A. A formal validation to ensure the corrective action has fixed the issue will take place.
- B. Monitoring and auditing activities will confirm ongoing compliance and prevent further non-compliance.
- C. The non-compliance is corrected.

Assessment End

Congratulations! You have completed training on Embracing a Culture of Compliance and you have taken the training assessment.

You must have scored an 80% to pass the assessment.

If you did not score at least 80%, please retake the training and assessment.

THANK YOU!