CARE1ST HEALTH PLAN
POLICY & PROCEDURE

Corporate Compliance Department

Policy Title: Distribution of Compliance Policies and Procedures (P&Ps), Anti-Fraud Plan (AFP), and Standards of Conduct (SoC) to Vendors and/or First-Tier, Downstream, and Other Related Entities (FDRs)

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<tr>
<th>Policy No: 50.17.20</th>
<th>Orig. Date: 11/2012</th>
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<tr>
<td>Effective Date: 7/2014</td>
<td>Revision Date: 4/2015</td>
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<td>Revision No: 1</td>
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<td>P&amp;P Subcommittee Approval: Date: 4/23/15</td>
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<td>Board Approval: Date: 4/23/15</td>
<td>Scope of Coverage: Medicare/MAPD and MMP</td>
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PURPOSE:

To formally document procedures in distributing Care1st Corporate Compliance Policies and Procedures (P&Ps), Anti-Fraud Plan for Vendors, and Care1st’s Standards of Conduct for Vendors and/or FDRs.

POLICY:

As part of Care1st’s compliance strategy to achieve an effective compliance program, Care1st Health Plan distributes its Standards of Conduct for Vendors, its Anti-Fraud Plan for Vendors, and/or FDRs and its Corporate Compliance Policies and Procedures in order to communicate compliance expectations to Care1st’s FDRs, and FDRs employees, with regards to the administration of Medicare-Medicaid Plan (MMP), and Medicare Part C and Part D programs.

Distribution must occur within 90 calendar days from contract for newly contracted FDRs and annually, thereafter. The distribution methods will be a) through the Care1st Health Plan’s website at https://www.care1st.com/ca/providers/compliance.asp?section=StandardsOfConduct; b) furnishing hard copies at the time of contract and electronic copies thereafter; or c) through Compliance Newsletters, Provider Newsletter, Bulletins, special mailings, e-mails, and other forms as Care1st’s Management sees appropriate.

PROCEDURES:
1. The Corporate Compliance Department obtains FDRs’ contact information (names, addresses, e-mails, etc.) from internal departments with Medicare and MMP accountabilities and/or responsibilities or the Compliance Department obtains a completed FDR Tracking Analysis Tool. The Compliance Department, in collaboration with Care1st’s internal departments (e.g., Provider Network Operations (PNO), Claims, Pharmacy, Finance, Credentialing, Contracting, Human Resources, etc.), releases a formal letter signed by the Corporate Compliance Officer informing Care1st’s FDRs to obtain copies of Care1st’s SoC, AFP, and P&Ps via the link https://www.care1st.com/ca/providers/compliance.asp?section=Standard §OfConduct and other instructions related to the distribution process. The letter also indicates that a completed attestation form must be returned to Care1st upon completion of the distribution process.
   a. The completed attestation form is returned to the Corporate Compliance Department via fax, e-mail, or mail.
   b. Attestations are retained in accordance with the Centers for Medicare & Medicaid Services (CMS) record retention requirement of 10 years.

2. The frequency of distribution is annually for current contracted FDRs and within 90 calendar days from date of contract for new contracted FDRs and annually thereafter.

Authorities and References:

- 3-way Contract with DHHS/CMS, DHCS, and Care1st Health Plan
- 42 Code of Federal Regulations (CFRs) - §422.503(b)(4)(vi)(A)
- 42 CFR §422.504(b)(4)(vi)(A)