



**Troy Medicare Policy and Procedure**

<b>Title:</b> Effective Lines of Communication		<b>Policy Number:</b> CMP 008	
<b>Primary Department:</b> Compliance	<b>LOB:</b> Medicare Advantage	<b>Author:</b> S Scott	
<b>Effective Date:</b> 10/26/2022	<b>Original Date:</b> 10/26/2022	<b>Review Date(s):</b> 11/24/2023, 10/15/2024	<b>Archive Date:</b>
<b>Interactive Related Department(s)</b>			
<input checked="" type="checkbox"/> All Departments <input type="checkbox"/> Compliance <input type="checkbox"/> Medical Management <input type="checkbox"/> Provider Operations <input type="checkbox"/> Sales and Marketing	<input type="checkbox"/> Appeals and Grievances <input type="checkbox"/> Customer Service <input type="checkbox"/> Member Services <input type="checkbox"/> Quality Management <input type="checkbox"/> Utilization Management	<input type="checkbox"/> Care Management <input type="checkbox"/> Enrollment <input type="checkbox"/> Plan Administration <input type="checkbox"/> Claims <input type="checkbox"/> Other _____	

**POLICY PURPOSE**

Troy Health, Inc. is committed to complying with the requirement to establish and implement effective lines of communication, ensuring confidentiality between the compliance officer, members of the Compliance Committee, employees, the Board of Directors, and all first-tier, downstream, and related entities (FDRs).

The purpose of this policy is to describe the communication methods accessible to allow compliance issues and potential fraud, waste and abuse to be reported, including a method for anonymous and confidential reporting in good faith.

Troy Medicare is committed to complying with federal and state rules and regulations.

**SCOPE**

This policy applies to all employees, Board of Directors, and FDRs.

**REFERENCES**

- 42 CFR 422.503(b)(4)(vi)(D)
- 42 CFR 423.504(b)(4)(vi)(D)
- Medicare Managed Care Manual Chapter 21 – Compliance Program Guidelines and Prescription Drug Benefit Manual Chapter 9 - Compliance Program Guidelines , Section 50.4

**RESPONSIBLE PARTIES**

- Chief Compliance Officer

**DEFINITIONS**

- First-tier, downstream, and related entities (FDRs) – contracted companies to perform health plan operations or health care services.
- Fraud, waste, and abuse (FWA) – violations of the use of health care dollars and resources.

## **POLICY**

Troy Health, Inc. has established methods for the Chief Compliance Officer to communicate information to other parties as necessary, and that allow employees, contractors, the Board of Directors, and FDRs to communicate directly to the Chief Compliance Officer. To build on this communication platform, the Compliance staff promotes the concept of open lines of communication and provides all employees with the opportunity to ask questions, report problems, or share concerns via multiple avenues.

Compliance staff regularly distribute HPMS memos and regulatory releases with the appropriate leadership over operational areas. Departmental leadership is expected to share such information with departmental employees and with FDRs. Tasks associated with those releases are tracked to ensure all required actions are completed within the timeframe allowed.

The Chief Compliance Officer shares other educational information to employees through the periodic distribution of the Compliance Newsletter. These communications strengthen employees', contractors', the Board of Directors', and FDRs' understanding of compliance concepts. Included in these communications are reminders about the obligation and responsibility of reporting issues of non-compliance and non-retaliation policies for good faith reporting.

The Troy Compliance and Ethics Hotline at 1-844-977-0475 is available for others to communicate to the Chief Compliance Officer of potential compliance issues or fraud, waste, or abuse. The Troy Compliance and Ethics Hotline web portal may also be used. Reported issues can be made anonymously. All reported issues are kept confidential, except when required to be disclosed by law. Others may also report issues to Compliance by sending an email to the Compliance email address or contact the Chief Compliance officer directly.

The Chief Compliance Officer communicates compliance issues directly with the Chief Executive Officer (CEO), the Compliance Committee, and the Board of Directors, as necessary and maintaining confidentiality as appropriate.

Anyone that reports compliance or potential FWA issues are protected by the non-retaliation policy if reports are made in good faith.

## **PROCEDURE**

All allegations of non-compliance and potential FWA are always investigated thoroughly.

- Identify the source(s) of the non-compliance or suspected FWA
- Apply root cause analysis procedures
- Request corrective actions of the root cause and implement controls and monitoring
- Confirm corrective actions were effective

Investigated compliance/FWA issues are reported to the CEO, the Compliance Committee, and/or the Board of Directors.

**ATTACHMENTS/RELATED POLICIES/STANDARD OPERATING PROCEDURES**

- None

**APPROVALS**

*Sally Scott*

Chief Compliance Officer

10/30/2024

Date

*Christina Za*

Policy Committee

10/29/2024

Date

**Revision History**

Revision Date	Revised by Whom	Revisions Made
11.24.2023	S Scott	Added commitment to compliance statement, revised the policy statement, updated procedure.
10.15.2024	S Scott	Annual review; updated regulatory references