

	PCHP.CP.104 Effective Lines of Communication V4	
	PCHP.CP.104	
	Name:	PCHP.CP.104 Effective Lines of Communication
	ID Number:	PCHP.CP.104

Body

Policy Name: Effective Lines of Communication

Scope: Entire Piedmont workforce

Purpose: To ensure Piedmont has effective methods to communicate to and receive communication from employees, contractors and agents for compliance and FWA issues and concerns in accordance with Federal and State laws, regulations and guidance.

Definitions & Acronyms:

CMS: Centers for Medicare & Medicaid

CFR: Code of Federal Regulations

FDR: First Tier, Downstream and Related Entity

PBM: Pharmacy Benefit Manager

Piedmont: "Piedmont" collectively refers to Piedmont Community Health Plan (PCHP), Piedmont Community HealthCare (PCHC) and any future entities that are owned, affiliated with and/or operated by Piedmont.

Policy:

1. Piedmont must offer effective lines of communication, ensuring confidentiality, between the Compliance Officer, members of the Compliance Committee and Piedmont employees, managers and governing body, contractors, and first tier, downstream, and related entities (FDRs). Such lines of communication must be accessible to all and allow compliance issues to be reported including a method for anonymous and confidential good faith reporting of potential compliance issues as they are identified.
2. Piedmont must have an effective way to communicate information from the Compliance Officer (or designee) to others within a reasonable time and to all appropriate parties. Such information should include but is not limited to:
 - a. Compliance Officer's name, office location and contact information;
 - b. Updates to laws, regulations and guidance for sponsors and FDRs, such as statutory, regulatory, and sub-regulatory changes (e.g. HPMS memos);
 - c. Updates to policies, procedures and Standards of Conduct
 - d. FWA alerts
3. All Piedmont employees, members of the governing body, and FDRs are required to report compliance concerns and suspected or actual violations related to the state and federal programs to the Compliance Officer or Compliance Department. Failure to report compliance concerns may result in disciplinary action.
4. Piedmont must have a system in place to receive, record, respond to, and track compliance questions or reports of suspected or detected noncompliance or potential FWA from employees, members of the governing body, enrollees, and FDRs and their employees. The system must maintain confidentiality (to the greatest extent possible), and allow anonymity if desired (e.g. through telephone hotlines or mail drops).
5. Piedmont must adopt, widely publicize, and enforce a no-tolerance policy for intimidation, retaliation or retribution against any employee or FDR who in good faith reports compliance concerns or suspected FWA.
6. Piedmont must include reporting requirements and the available methods for reporting in general compliance training.
7. Piedmont must make the reporting mechanisms user friendly, easy to access and navigate, and available 24 hours a day for employees, member of the governing body, and FDRs.

Procedures:

-

1. How to Communicate Issues of Non-Compliance or FWA to Piedmont

A. When to Report

- i) Piedmont employees can report compliance concerns and suspected or actual violations related to Federal and State Laws, Piedmont's Code of Conduct, and Piedmont's Compliance Program including FWA, at any time.
- ii) Anyone who in good faith believes that a violation of law or policy will occur, is occurring, or has occurred at Piedmont must report their concern. People need not know the details of a law or policy or be certain about a violation. If unsure, the better course of action is to raise the concern.

B. What Report Methods to Use

- i) Issue Ticket System: Use the Issue Ticket System to report errors or non-compliance discovered in the daily processes governed by Piedmont's policies and procedures. See Policy PCHP.TKT.101.
- ii) **SharePoint Tool: Use the Compliance Incident Reporting Tool located on the Compliance page of Piedmont's SharePoint site. See SOW PCHPALL- 8 SharePoint Incident Reporting (attached for quick reference)**
- iii) Letter, Email, Fax, Verbal, Other: To report compliance or FWA concerns, there are no specific reporting structures that must be followed in order for us to investigate a potential problem. You may report in writing, handwritten or typed, verbally or any method that is convenient for you. The important thing is to alert someone when you believe a violation has occurred.

C. Where to Report – Options

- i) To the Department Supervisor or Product Manager. Typically, concerns should be raised first at the "department" level. Usually, the department or product management level is most familiar with the issues and parties and is best equipped to handle the concern.
- ii) To the Compliance Officer, Compliance Department or Compliance Committee. Sometimes, because of the subject matter involved or because of work or personal relationships, concerns may be best raised with a confidential source outside of the department.
- iii) Using the toll free Centra Hotline, at 1-800-713-4703, which is available 24 hours a day, 7 days a week.
- iv) Delegated entities may report suspected compliance issues to Piedmont's management, Compliance Officer, or as appropriate, to the Business Owner responsible for the vendor agreement to which the contractor or agent is subject.
- v) All members of Piedmont management promote an "open door policy" which permits employees to discuss any suspected violation of the Code of Conduct or other Compliance policies.
- vi) 1-800-MEDICARE for Medicare Advantage and Part D concerns.
- vii) **SharePoint Incident Reporting Log**

D. How to Report Anonymously

- i) Call the toll free Centra Hotline, at 1-800-713-4703
 - 1. The hotline is available 24 hours a day, 7 days a week.
 - 2. Calls to this number are processed through the Centra Compliance Department.
- ii) Delegated entities should follow the anonymous reporting systems established within your organization, or you may report using any of the contacts below. Confidentiality and anonymity for the reporter shall be maintained to the fullest extent possible.

E. Protections for Persons Making a Report

- i) Piedmont does not allow any retaliatory action directed against an employee who, in good faith, raises a concern, reports suspected misconduct or contacts federal or state authorities.

- ii) If an employee suspects that she/he, or another person, is being retaliated against for raising a concern, reporting suspected misconduct, or contacting federal or state authorities, she/he shall immediately contact the Compliance Department or call the Compliance Hotline.
- iii) All instances of retaliation, retribution or harassment against reporting employees will be brought to the attention of the Compliance Officer who will, in conjunction with the Human Resources Department, investigate and determine the appropriate discipline, if any.
- iv) Any executive, manager, or employee who engages in retaliation, retribution or harassment against a reporting employee will be subject to discipline up to and including termination.
- v) If an employee reports a concern regarding his or her own inappropriate or inadequate conduct, the reporting employee may be disciplined appropriately even if the employee was the one who disclosed the conduct. Piedmont may consider the employee's decision to report the conduct, and any subsequent cooperation, as mitigating factors in any disciplinary action.
- vi) Employees will not be subject to any reprisal for a good faith report of a potential or suspected compliance violation, even if the potential or suspected compliance violation is determined to be unfounded.

F. Compliance Contacts

Write: Compliance Department
Piedmont Community HealthCare, Inc.
2316 Atherholt Rd.
Lynchburg, VA 24501

Call: Garland Morton, Compliance Officer
Phone: 434-947-4463 X 306
Toll Free: 1-800-400-PCHP

Call: Centra Hotline at 1-800-713-4703, 24 hours a day, 7 days a week (Anonymous)

Call: 1-800-Medicare for Medicare Advantage or Part D Concerns

Fax: Piedmont Compliance Department
434-947-3670

SharePoint: [Incident Reporting Log on Compliance's Team Site](#)

2. How Piedmont Communicates Effectively to the Workforce

- A. **Fraud Alerts:** Piedmont's compliance department sends out emails whenever new or potential fraud activity has occurred. Such fraud can occur within Piedmont's service area, or nationwide. Regardless of the effect on Piedmont's line(s) of business, the compliance department sends fraud alerts and reminders for employees to be mindful about FWA.
- B. **Policy and Procedure and Code of Conduct Blasts:** Piedmont's compliance department sends out email blasts to all employees and applicable FDRs whenever the Code of Conduct, or any Compliance Policy and/or Procedure have changed and been approved.
- C. **Cross-Departmental and FDR Meetings:** Piedmont regularly holds meetings between the managers of the various business functions to communicate any general business concerns and potential areas of compliance risk. Such meetings may include, but are not limited to, the following:
 - i) Product team meetings;
 - ii) Audit Prep meetings, i.e. universe meetings
 - iii) Compliance Committee meetings
 - iv) Fraud Task Force meetings
 - v) Delegation Oversight Committee meetings
 - vi) Issue Ticket/CAP meetings
 - vii) Senior Leadership meetings
 - viii) FDR telephonic conferences with account representatives, weekly or as needed
 - ix) Ad hoc meetings when necessary
- D. **Daily distribution of regulatory guidance:** Piedmont receives regulatory guidance on a daily basis from a variety of sources. Piedmont's **Product** departments maintain a log of distribution of the memos to the appropriate

department manager(s), and FDRs. The distribution of the memos is tracked to maintain historical data on the communication of the regulatory changes throughout the company.

- E. Posters in high traffic areas: Piedmont management prepares posters that include information on reporting issues of non-compliance, and include all appropriate language regarding anonymity, and policy language on non-retaliation for good faith reporting of suspected issues of non-compliance and FWA.
- F. Desktop Reminders (memo clips with hotline number, pens, whistleblower key chains): Piedmont's compliance department from time to time distributes items of nominal value for employees to post at their desk, which include methods for reporting suspected issues of non-compliance and FWA.

3. Beneficiary Education

- A. Piedmont is proactive in educating its enrollees about identifying and reporting FWA.
- B. The Compliance Department provides an article for **periodic** newsletter publications geared towards educating enrollees on things they can do to help prevent fraud, waste and abuse.
- C. Piedmont provides Fraud, Waste and Abuse information on its website including:
 - i) Examples of possible fraud schemes
 - ii) Who to contact if an enrollee believes they have been a victim of fraud

Equipment: None

Forms and Letters: None

Reference(s): [42 CFR Sections 422.503\(b\)\(4\)\(vi\)\(D\), 423.504\(b\)\(4\)\(vi\)\(D\)](#); Medicare Managed Care Manual, Chapter 21 and Prescription Drug Benefit Manual, Chapter 9 (Rev. 1-11-13) – Compliance Program Guidelines, Section 50.4

Interdisciplinary Review: None

Policy History

Date	Revision No.	Reason for Change	Sections Affected
01/19/2011	Draft		All
07/22/2011	NEW	<ul style="list-style-type: none"> ▪ Policy template modified changing header ▪ Approved by Compliance Committee 	All
07/10/2012	1.0	<ul style="list-style-type: none"> ▪ Responsible Area/Dept updated to include Delegated Entities ▪ Policy template modified adding Definitions and History sections ▪ Policy updated with various reporting forms available for use. ▪ Policy updated to include Product Manager. ▪ Added Compliance mail tray downstairs for greater anonymous access; updated attached Violation form. 	Header, Definitions, Procedures, History & Attachment A
01/11/2013	2.0	<ul style="list-style-type: none"> ▪ Reformatted Policy Header to include Lines of Business and more detail for Responsible Departments. Removed Category (Dept Type) and sections for Revised Date and Review Date. ▪ Updated Policy and Procedures to provide reference to new policy on Non-retaliation. 	Header and Procedures
01/17/2014	3.0	<ul style="list-style-type: none"> ▪ Added new email address and process for anonymous reporting. ▪ Added procedures for tracking issues. ▪ Added procedures for educating enrollees on FWA. 	Policy, Procedures, Exhibit B

		<ul style="list-style-type: none"> ▪ Updated street address to Atherholt Rd. location. ▪ Updated Compliance and FWA form with new anonymous reporting information. 	
11/19/15	4.0	<ul style="list-style-type: none"> ▪ Converted Policy to Centra format, new numbering system, and new housing location on Centra's Intranet ▪ Added procedures on how Piedmont communicates to the workforce. ▪ Updated policy language. ▪ Incorporated language from Centra's policy on Non-Retaliation. 	All
12/29/16	5.0	<ul style="list-style-type: none"> ▪ Removed anonymous email option (GetInTouch.com) ▪ Other minor clarifications throughout P&P 	All
01/18/18	6.0	<ul style="list-style-type: none"> ▪ Policy 3 – updated to include all products more broadly ▪ Procedure 2(C) updated to include new meetings and exchange task force. 	Policy 3 Procedure 2C
1/21/2019	7.0	<ul style="list-style-type: none"> ▪ Added information on how to report through SharePoint ▪ Updated oversight of regulatory notices to Product departments ▪ Removed reference to NBI Medic website from Piedmont's website 	Procedure 1B (ii), 1C (vii), 1F Procedure 2D Procedure 3C (iii)

Document Link Manager

No Documents Linked No Documents Linked

Attachment Manager

No Attachments