

HEALTH CARE SERVICE CORPORATION

POLICY

DEPARTMENT: Ethics and Compliance	
POLICY NUMBER: 5.09	POLICY TITLE: Cooperating with the Government
EXECUTIVE OWNER: EVP, Chief Administrative Officer & Chief Ethics, Compliance and Privacy Officer	BUSINESS OWNER: Exec Dir Corp Compliance
ORIGINAL EFFECTIVE DATE (IF KNOWN):	COMMITTEE APPROVAL DATE: 05/02/2024

I. SCOPE

This policy applies to all employees and contingent workers as defined in the HR Workforce Classifications Policy (“Workers”) of Health Care Service Corporation, a Mutual Legal Reserve Company, as well as its majority-owned (greater than 50%) subsidiaries (collectively “HCSC”).

II. PURPOSE

The purpose of this policy is to articulate HCSC’s commitment to fully cooperating with all applicable laws and guidelines, including Centers for Medicare and Medicaid Services (CMS) guidelines when responding to inquiries, audit requests, reviews or investigations (collectively “requests for information”) by the government or regulatory agency or any designee of the government or regulatory agency.

III. POLICY

HCSC is committed to cooperating with the government, regulatory agencies and their designees, and shall do the following related to requests for information, including but not limited to:

- Workers who routinely interface with government, regulatory agencies and their designees, shall follow job specific training related to responding to requests for information.
- Workers who do not routinely interface with government, regulatory agencies and their designees shall forward any verbal or written requests for information, other than routine inquiries typically received in the normal course of business, to the Legal Division;
 - Treat any such requests for information from the government as one of your highest priorities; and work with the Legal, Audit and/or Compliance Departments or management as appropriate;
- Respond to requests for information within the requested timeframe, and ensure that the information provided is truthful and accurate;
 - Never impede, obstruct, improperly influence the conclusions of, or affect the integrity or availability of any government review or investigation;
- Always show respect;

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- If the government or regulatory agency has a vendor working on their behalf, deal with that vendor as if it were the agency itself;
- If the Legal Division is engaged on the matter, do not produce any information without their approval;
- Never lie or make false or misleading statements, whether oral or written to any government official or agency or anyone acting on their behalf, such as a lawyer, vendor or investigator.
- Never attempt to persuade or assist a Company employee or any other person, to provide false or misleading information to a government official or agency;
- Never destroy or alter any Company document or record when anticipating or following a government or court request for the document or record; and
- Honor all holds that are placed on our normal document destruction procedures when a government audit or investigation is imminent or pending. Maintain this hold until instructed in writing by the Legal Division that it can be released.

IV. CONTROLS/MONITORING

Control Document or Control Description	Control Owner
As part of orientation, and on an annual basis thereafter, all Workers are required to complete computer-based training on the Compliance Program. This training is assigned by the Ethics and Compliance Department.	Ethics and Compliance
All Workers are required to sign the Commitment to Ethics Certification at the time of New Hire Ethics and Compliance training and annually thereafter. Required certifications are signed electronically. The signed Certification is maintained in HCSC's Learning Management System.	Ethics and Compliance
All HCSC Workers are required to complete training on the RIM Policy, Procedures, and Retention Schedule at least every other year. The RIM training is updated with new content by the RIM department.	Legal
Job specific training may be delivered via an assigned web-based course that is administered by Blue University.	Blue University
Business area Management is responsible for instructing staff on how to appropriately respond to inquiries and request for information from the government, as well as monitoring their employees' progress toward completing the RIM training.	Business Area Management

V. RELATED DOCUMENTS

1. [Compliance Program Charter](#)
2. [Compliance Program](#)
3. [Code of Ethics and Conduct](#)
4. [3.02 External Regulatory Examinations](#)

VI. IMPACTED BUSINESS AREAS

1. Legal

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2. Government Programs Compliance

VII. POLICY REVIEWERS

Person Responsible for Review, and Committee Reviewing as FYI	Title	Date of Review
Carrie O’Gara	Exec Dir Corp Compliance	3/10/24
David Culberg	Managing Counsel, Legal	4/16/24
Kim Green	Vice President Government Programs Compliance	3/11/24

VIII. POLICY REVISION HISTORY

Description of Changes	Revision Date
Annual review with minor updates	5/2/24

IX. POLICY APPROVALS

Company, Division, Department, and/or Committee	By: Name	Title	Approval date
CASSIP	Jill Wolowitz	EVP, Chief Administrative Officer & Chief Ethics, Compliance and Privacy Officer	4/24/24
EPP Committee			5/2/24