

Policy Title: Reporting Violations Pertaining to Compliance, Fraud, Waste or Abuse

- Scope:** This policy applies to:
- All contracted or employed parties (individuals and entities) supporting a contract Sunderland Group has entered into to perform any function for a Sponsor
 - Each Sponsor with which Sunderland Group has a contract
- Policy Statement:** Sunderland Group is committed to complying with laws, regulations and contractual obligations to report any individuals and parties excluded from federal or state programs, as well as individuals and parties, with confirmed compliance and/or fraud, waste and abuse violations to an impacted Sponsor:
- Narrative Description:** Sunderland Group notifies an impacted Sponsor in a timely manner when both the following have occurred:
- a party has committed a violation of compliance policy(s), standards of conduct, government laws or regulations and/or a contract with a Sponsor; and
 - the party was responsible for performing a function on behalf of the Sponsor, regardless of whether the violation(s) involved an existing or prospective member of a Sponsor's plan.
- The notification to the impacted Sponsor shall list at least the following:
- The party(s) committing the violation(s);
 - When the violation(s) occurred;
 - Type of violation (data breach, improper data access; misuse or falsification of information, etc.);
 - If the violation involved an existing or prospective member of the Sponsor's plan;
 - Details of the violation if it involved an existing or prospective member of the Sponsor's plan;
 - Disciplinary action(s) taken, which can include, but are not limited to:
 - Conducting additional training;
 - Creating, revising and/or communicating policy(s) and procedure(s) to close process or knowledge gaps;
 - Issuing a corrective action plan;
 - Status of corrective action plan (closed or ongoing);
 - Removing a party from supporting a Sponsor; and/or
 - Terminating employment or the contract of the involved party(s).
 - Timing of disciplinary action(s) taken
- Sponsor:** Any entity that holds a contract with a government agency to administer a plan for Medicare and/or Medicaid beneficiaries.
e.g., Humana
- Definitions:**
- Related Documents:**
- Humana Compliance Policy for Contracted Health Care Providers and Business Partners
 - Humana Ethics Every Day for Contracted Health Care Providers and Business Partners
 - 42 C.F.R. §§ 422.503(b)(4)(vi)(D)
 - 42 C.F.R. §§ 423.504
 - CMS Managed Care Manual
50.4.2 – Communication and Reporting Mechanisms
(Chapter 21 - Rev. 109, Issued: 07-27-12, Effective: 07-20-12; Implementation: 07-20-12)
(Chapter 9 - Rev. 15, Issued: 07-27-12, Effective: 07-20-12; Implementation: 07-20-12)
 - Contract(s) with Sponsor(s)