



Corporate Compliance Plan

It is the policy of BHI that all of its business and other practices shall be conducted at all times in compliance with all applicable laws and regulations of the United States, the State of Colorado, all other applicable local laws and ordinances, and the ethical standard/practices of the industry and BHI.

BHI adopted a Corporate Compliance Plan and it is the responsibility of the Contracted Provider Network to adhere to this plan at all times. BHI's Corporate Compliance Plan is directed by the Corporate Compliance Officer (CCO). BHI's Contracted Provider Network is expected to conduct all business activities honestly and fairly. Any form of cheating or misrepresentation is forbidden. All independent providers are obligated to report to BHI their good faith belief of any possible violations of the compliance plan program or laws:

- By telephoning the CCO at (720) 490-4407.
- By mailing your written concern to :
Corporate Compliance Officer
155 Inverness Drive West, Suite 201
Englewood, CO 80112
- By calling, on an anonymous basis, the Corporate Compliance Hotline at (720) 490-4407.

Upon receipt of a report suggesting a compliance issue in which the laws, rules and standards of the Medicare or Medicaid programs may not have been followed, the CCO will initiate an investigation. The investigation may include interviews with persons associated with the alleged activity, review of all identified related documentation and consultation, if needed, with internal or external resources with knowledge of the applicable laws, regulations and required policies, procedures or standards. The CCO will prepare a summary report. If this initial investigation concludes that there was improper activity, the summary report will be presented to the Chief Executive Officer and BHI legal counsel for possible criminal investigation.

Enforcement Action

In the event BHI uncovers criminal activity on the part of any employee, provider or contractor, BHI will take the following steps:

- BHI will immediately stop further authorization of services or payments related to the problem until such time as the offending practices are corrected. BHI will take all necessary action to ensure that no consumers are placed at clinical risk.
- BHI will initiate appropriate disciplinary action against the person(s) whose conduct appears to have been intentional, willfully indifferent or with reckless disregard of the Medicare and Medicaid laws. Appropriate disciplinary action may include the suspension, demotion or discharge of an employee or credentialed provider.
- BHI will make such external notification as legal counsel for BHI advises. This includes, at a minimum, the Medicaid Fraud Control Unit of the Colorado Attorney General's Office and the Director of the Managed Care Contracting Division of the Department of Health Care Policy and Financing.