

 <p>UNITED CARE MEDICAL GROUP, INC. ("UCMG")</p>	Title: Chartering of Compliance Committee & Subcommittee
	Scope: All UCMG and MSO Activities conducted by or for UCMG by ADOC Departments, Staff, Management, Officers and FDRs of UCMG
	Issued By: UCMG Board of Directors, ADOC Medical Group
	Approved By: UCMG Board of Directors 9/5/2014
	Date: 7/21/2014
Pages: Three (3)	Revised: Compliance Committee 02-05-2015
	Policy Number: COMP 13-002

POLICY AND PROCEDURE

Purpose:

To establish the duties and responsibilities of the UNITED CARE MEDICAL GROUP, Inc. ("UCMG") Compliance Committee ("COC"), and its executive subcommittee to be known as the Executive Compliance Committee ("ECC")

Background:

UNITED CARE MEDICAL GROUP, Inc. ("UCMG") in conjunction with ADOC Medical Group, Inc. ("ADOC") it duly assigned management services organization under a management services agreement dated , hereby formally establishes its Compliance Program and Anti-Fraud, Waste, & Abuse Program. Due to the fact that most of the staff, functions, and operations of UCMG are actually provided by ADOC staff or management, even where it is not specified, practically speaking operational aspects of the Compliance Plan shall be carried out by Compliance Officer and by ADOC staff under its management services agreement. The Compliance Program and its integrated Codes of Conduct and Anti-Fraud, Waste, and Abuse Programs, are delineated and outlined in its Compliance Plan and are structured in accord with the guidance and requirements provided by the United States Department of Health and Human Services, Office of Inspector General, and pursuant to statute and regulations applicable to any participating provider organization serving Medicare and/or Medicaid beneficiaries or related to any programs administered by the Centers for Medicare and Medicaid Services (CMS) and or which derive or relate to any services covered under the jurisdiction of the California Department of Managed Health Care or the California Department of Health Services, the California Medical and Nursing Boards, or the California Department of Insurance. Beyond these regulatory authorities (CMS, DMHC, Cal DHS, and CA DOI), UCMG is subject to a myriad of laws, regulations, and contractual obligations, that govern its conduct and business, and prescribe and proscribe the manner under which UCMG conducts its activities. The Compliance Office is responsible for implementing a Compliance Program to ensure that UCMG and its first tier, downstream, and related parties, conduct themselves and provide all services in compliance with all applicable federal, state, and local laws and regulations. It is therefore necessary to establish a Compliance Committee ("Committee") to advise and assist the Compliance Officer with implementing and maintaining an effective compliance program.

POLICY:

1. UCMG will maintain a Compliance Committee that will meet on a regular basis, no less than quarterly, to advise the Compliance Officer and assist with the development, implementation and maintenance of the UCMG Compliance Program.
2. The UCMG President and Chief Executive Officer, its Medical Director, and the ADOC Chief Operating Officer, shall appoint the members of the Committee. The Committee shall receive direction from, and report directly to, the Chief Compliance Officer when working on Compliance related issues.

Responsible Departments:

Compliance Department, inclusive of participation of all contributing committee members covering most departments of UCMG MEDICAL GROUP, Inc.

Procedure:

1. The Committee shall assist the Chief Compliance Officer with developing standards of conduct and policies and procedures to promote compliance within UCMG.
2. The Committee shall assist the Chief Compliance Officer in identifying potential risk areas, and shall advise and assist the Compliance Officer with compliance initiatives.
3. An executive subcommittee of the Compliance Committee, which shall be known as the Executive Compliance Committee (ECC), shall be composed of the Chief Compliance Officer, UCMG President, UCMG's Medical Director, and ADOC's **Regional Medical Director of Regulatory & Health Plan**, the COO, General Counsel, the Vice President of Human Resources, and the Vice Present of Information Technology (plus the Chief Privacy and Security Officers if not monthly and shall be entrusted with matters and subjects that include extremely holding one of the other included positions). The ECC shall meeting time sensitive and extremely confidential matters. These activities and deliberations will be summarized and redacted in order to foster the compliance, anti-fraud, waste, and abuse, security and privacy rights of any individuals, as well as to prevent any interference with any pending or present or future prosecution or investigations.
4. The Committee shall include representatives from Senior UCMG and ADOC Management. Committee members will be appointed jointly by the Agency Director and the Compliance Officer. The Chairman of the Meeting shall be the Chief Compliance Officer, The members of the Compliance Committee (COC) are listed as follows : (**Bold** signifying those members that are on ECC)

- a. **Chief Compliance Officer**
 - b. **ADOC Regional Medical Director of Regulatory & Health Plan (“MD-C”)**
 - c. **ADOC Chief Operating Officer (COO)**
 - d. **ADOC /UCMG General Counsel**
 - e. **ADOC Vice President of Human Resources (“HR”)**
 - f. **ADOC Vice President of Information Technology**
 - g. **ADOC-UCMG Chief Privacy Officer (“CPO”)** (if not elsewhere listed as member of COC)
 - h. **ADOC-UCMG Chief Security Officer (“CSO”)** (if not elsewhere listed as member of COC)
 - i. **ADOC Director of Claims (and Customer Service)**
 - j. **ADOC Senior Vice President of Network Management (No. or South, as designated by COO)**
 - k. **DOC-UCMG Chief Medical Officer (“CMO”)** (Alternating per year as designated by MD-C)
 - l. **Ex-Officio: Heritage Provider Network, Inc. – Compliance Oversight Specialist**
 - m. **Ex-Officio: Heritage Provider Network, Inc. - Corporate Compliance Officer**
 - n. **Ex-Officio: Chief Financial Officer (“CFO”)**
5. The Compliance Committee shall meet monthly at regularly scheduled meetings, at least four (4) times per calendar year. The agendas, sign ins, binders of reviewed materials, and the minutes for the meetings shall be considered highly confidential and shall be retained in the Compliance Office.
 6. A quorum for CC voting purposes shall include no less than four (4), inclusive of their being at least 3 members of the Executive Compliance Committee so voting. Members may participate in meetings using telephonic call in or videoconferencing as possible.

Attachments: