Title: Designation of Compliance Officer			**Policy Number:** CMP 019
Primary Department: Compliance	**LOB:**Medicare Advantage/Part D		**Author:** S Scott
Effective Date: 12/1/2022	**Original Date:** 1/8/2023	**Review Date(s):** 4/26/2023, 4/19/2024	**Archive Date:**
Interactive Related Department(s)			
☐All Departments ☑ Compliance ☐Medical Management ☐Provider Operations ☐Sales and Marketing	☐Appeals and Grievances ☐Pharmacy ☐Member Services ☐Quality Management ☐Utilization Management	☐Care Management ☐Enrollment ☐Plan Administration ☐Claims ☐Other	

POLICY PURPOSE

The purpose of this policy is to set forth the procedures to be followed by Troy Health, Inc. ("Troy Medicare" or the "Company") in appointing the Chief Compliance Officer (the "CCO"). The CCO, with the assistance of the Compliance Committee, is responsible for the development, implementation, and maintenance of Troy Medicare Compliance policies, and monitoring and promoting compliance at Troy Medicare with its compliance program (the "Compliance Program") and applicable federal and state laws.

Troy Medicare is committed to complying with federal and state rules and regulations.

SCOPE

This policy applies to the Compliance Department and all employees.

REFERENCES

- 42 C.F.R. §§ 422.503(b)(4)(vi)(B)
- 42 C.F.R. §§ 423.504(b)(4)(vi)(B)

Medicare Managed Care Manual, Chapter 21 and Prescription Drug Benefit Manual Chapter 9, Section 50.2.1

RESPONSIBLE PARTIES

- Chief Executive Officer
- Chief Compliance Officer

POLICY:

The Chief Compliance Officer will oversee and monitor the Compliance Program and work with departmental leaders to ensure compliance with the Medicare Part C and Part D Program requirements. The Chief Compliance Officer will function as an independent and objective body that reviews and evaluates compliance issues and concerns within Troy Medicare and will be given the appropriate level of authority so he/she can exercise independent judgment without fear of reprisal.

PROCEDURE

A. Chief Compliance Officer. The CCO is appointed by the Chief Executive Officer and/or the Board of Directors and shall have direct access to Troy Medicare's CEO, Board of Directors, all senior management, and legal counsel. The CCO should not be subordinate in function or position to counsel or the legal department, in any manner.

The specific responsibilities of the CCO include the following:

1. Overseeing, monitoring, and maintaining the implementation and effectiveness of Troy Medicare's Compliance Program policies.
2. Serving as chair of the Compliance Committee, including scheduling meetings and developing meeting agendas.
3. Analyzing existing and new compliance risk areas and apprising senior management and the Board of Directors of these areas.
4. Serving as chair of the Compliance Committee, including scheduling meetings and developing meeting agendas.
5. Modifying and amending the Compliance Program, as appropriate, to respond to identified compliance risk areas, and to reflect changes, clarifications or updates in applicable laws, regulations, and policies.
6. Developing, maintaining and disseminating written policies and procedures to address existing and new compliance risk areas.
7. Developing, coordinating, and documenting Troy Medicare's annual and targeted compliance-related educational and training programs.
8. Coordinating routine and ad hoc internal and external compliance reviews, investigations and/or audits to assess continued adherence to the Compliance policies.
9. Modifying and amending the Code of Business Conduct, as appropriate, to respond to identified changes in laws, regulations or program requirements, identified risk areas and/or changes in the nature or scope of Troy Medicare's business or contractual obligations.
10. Documenting and responding to alleged violations of rules, regulations, policies and procedures by evaluating and recommending the initiation of investigative procedures. Develops and oversees a system of uniform handling of such violations which includes all

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incidents of suspected fraud, waste and abuse.

11. Maintaining and managing the Troy Medicare Compliance and Ethics Hotline.
12. Reporting, at least annually, to the Board of Directors and whenever called upon to do so, on compliance issues and the status of Troy Medicare's Compliance Program (including results of the annual compliance audit and any operational or cultural obstacles to the effective implementation of the Compliance policies).
13. Consulting with Troy Medicare's legal counsel, as needed, about the reporting of self-discovered violations of federal or state health care program requirements.

B. Access to Personnel and Information

1. The CCO and his/her designees have the authority to interview all company personnel and review all documents and other information necessary to discharge their responsibilities.
2. The CCO has express authority to provide reports to Troy Medicare's CEO and Board of Directors at the CCO's sole discretion.

C. Non-Retaliation

1. The Chief Compliance Officer will not be retaliated against, disciplined, terminated or be subject to any adverse action for performing his/her duties such as investigating, reporting, auditing and monitoring of all compliance and privacy program related duties, responsibilities, incidents, matters and risks.

ATTACHMENTS/RELATED POLICIES/STANDARD OPERATING PROCEDURES

- *Troy Medicare Compliance Plan*

APPROVALS

Chief Executive Officer	Policy Committee
04 / 23 / 2024	04 / 24 / 2024
Date	Date

Revision History

Revision Date	Revisions Made
11.24.2023	Updated procedure, added commitment to compliance statement
4.19.2024	Annual review with minor edits

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