To: Joint Conference Committee (JCC) Members

From: Irene Lo, MD FACS; Chief Executive Officer (Interim)
      Chanda Gonzales, Compliance Officer
Date: June 6, 2025

Subject: Compliance Work Plan for year 2025-2026

Background

The Compliance Department submits the revised Compliance Plan for review and approval by the JCC. The Compliance Plan is part of the overall Compliance Program and is required, by state and federal regulations, to be reviewed and approved by the health plan's governing body.

Summary and Purpose

The submitted Compliance Plan outlines the core elements of a Compliance Program with details about roles, responsibilities, and requirements. The Compliance Plan reflects CCHP's aim and goal of conducting ethical, transparent actions that reflect compliance with all state and federal regulations and ultimately creating a more efficient and trustworthy organization for our health plan members, providers, community partners, and our workforce.

The Compliance Plan addresses the following:

   I.   Code of Conduct, Written Policies and Procedures
           ● Purpose, maintenance, and distribution of these documents
  II.   Compliance Officer, Compliance Committee, and Oversight
           ● Criteria, roles, and responsibilities of these key entities
 III.   Training and Education
           ● Required training for staff, board members, and contractors
 IV.   Effective Lines of Communication – Reporting of Non-Compliance
           ● System to ensure regulatory requirements and reinforcement of ethical and lawful behavior
  V.   Enforcement and Disciplinary Standards
           ● Enforcement of the Code of Conduct and maintaining a zero-tolerance policy toward any unethical or illegal conduct performed by the organization

VI.   Effective System for Routine Monitoring, Auditing, and Identification of Compliance Risks
- Annual risk assessment to identify and evaluate compliance and FWA risk areas

VII.   Procedures and Systems for Prompt Response to Compliance Issues
- Investigation, resolution, and reporting of potential non-compliance

VIII.   Prevention and Detection of Fraud, Waste, and Abuse (FWA)
- Proactive monitoring for FWA

IX.   Compliance Reporting Structure and Independence
- Maintaining independence of Compliance Program from operational functions