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Doing the Right thing in the Right Way.



Why should I use the compliance hotline/web intake portal?

Use AmeriHealth Caritas' corporate compliance hotline to ask questions about how to properly handle any situation under the Company's Code of Ethics and Conduct and to report illegal or unethical conduct, violations of corporate policies, or violations of state and federal laws if you prefer not to use the Company's internal reporting channels.

Complying with sound ethical standards is one of the most important responsibilities of all AmeriHealth Caritas associates. Each of us, through our daily actions, determines what kind of company we are. If you have a concern, if you are not sure what is right in a particular situation, if you have reasonable grounds to suspect that others in the Company might be breaking the rules, you should let us know.

What's the difference between the hotline and the web-intake portal?

When you call the hotline a live person (a communications specialist) will answer the call and begin asking you detailed questions to help you describe the issue you want to report. The communications specialist will be the person transcribing or 'typing up' the information into a text format. When you go online to use the web-intake portal you will be typing out the information yourself in web form provided. Both the hotline and web-intake portal are secure, confidential, and accessible 24 hours a day from any land line, smartphone or computer.

What types of issues should I report?

You can use the AmeriHealth Caritas corporate compliance hotline/web-intake portal to ask a question about Company policies or compliance issues. You can also use it to report activities that may be illegal, unethical, or violate Company policies, including but not limited to concerns about:

- Health Care Fraud and Abuse
- HIPAA Privacy and Security
- Ensuring Appropriate Services for Members
- State Contract Compliance
- Accurate Books, Records and Documents
- Accounting and Internal Controls
- Conflicts of Interest
- Gifts, Entertainment and Honoraria
- Use of Company Property and Time
- Retaliation

These and other compliance matters are described in AmeriHealth Caritas' Code of Ethics and Conduct.

What if I am not an AmeriHealth Caritas employee?

Vendors, consultants, business associates, officers, directors, physicians, members, etc., and anyone else with information about suspected misconduct, compliance violations, illegal or unethical activity at AmeriHealth Caritas Family of Companies may use the Company's 24 hour confidential hotline and web-intake portal. We need you to come forward and provide all the facts that you know as soon as possible so the Company can investigate the issue.

What if I don't have all the facts?

When in doubt, it's best to report the matter and just provide the facts as you understand them at the time.

What happens when I call the hotline phone number?

You will speak with a call center communication specialist employed by Navex Global, the independent company that administers AmeriHealth Caritas' secure compliance reporting services. The communications specialist will gather

information about your report or concern asking you to provide detailed information. You may choose to remain anonymous; however, sometimes remaining anonymous can limit a full investigation. Therefore, we encourage you to leave your name. You may also be asked to provide the names of individuals involved, and the names of any other witnesses.

At the end of the call the communications specialist will notify AmeriHealth Caritas' Compliance and/or Corporate and Financial Investigations team that a new report was submitted. The Navex Global communications specialist cannot provide you advice or resolve your issue over the phone. If your matter is urgent, s/he will provide you with information to contact the AmeriHealth Caritas Compliance or Corporate and Financial Investigations team directly so you can receive a more immediate response.

The communications specialist will provide you with a **REPORT KEY** and personal password for you to access the follow-up on your inquiry or report after five (5) business days. Keep the **REPORT KEY** in a safe place because you will need it to use the "Follow-up" feature to check on the status of your report later.

What happens when I log on to the web-intake portal?

The hotline website walks you through the entire process online. It presents questions, offers dropdown menus, and has text boxes for you to type in specific details. You may choose to remain anonymous; however, doing so could make it difficult to conduct a full investigation. Therefore, we always encourage you to leave your name. You may also be asked to provide the names of witnesses and other parties involved.

After you supply all the necessary information the system will assign you a **REPORT KEY**. You will be asked to create a personal password for you to follow up on your report after five (5) business days. Keep your **REPORT KEY** in a safe place because you will need it to use the 'Follow-up' feature to check on the status of your report at a later time.

Do I have to give my name?

When you use the AmeriHealth Caritas corporate compliance hotline or web intake method, you have the option to remain anonymous. However, if you do choose to remain anonymous, that sometimes makes it more difficult to establish whether the allegations are true and substantiated. It also may not be possible for the Company to carry out a full investigation. We therefore encourage you to identify yourself so that we can follow up on your questions or concerns as promptly and thoroughly as possible.

Please remember that it is against Company policy to retaliate against anyone who believes that a compliance or ethics violation has occurred and does the right thing by reporting it in good faith.

What happens if I decide to leave my name?

Even when you do leave your name, AmeriHealth Caritas will make every reasonable effort to keep your identity confidential. It may be necessary to disclose your name to the Compliance or Corporate and Financial Investigations team, and/or to those with a need to know in connection with administration of the departments involved or affected by your report. Anyone who receives information about a report is reminded of their obligation to also maintain confidentiality. Many investigations can be completed more quickly and effectively when the reporter is identified because it allows AmeriHealth Caritas' Compliance or Corporate and Financial Investigations team to follow up with the reporter directly.

Is it really anonymous?

Yes. All of the information that you provide through the hotline or web-intake portal is really anonymous if you do not wish to leave your name. Navex Global does not trace phone calls or use caller ID. In addition, Navex Global does not generate or maintain internal connection logs with Internet Protocol (IP) addresses, so no information linking your computer to Navex Global would be available. Reports from your computer would come through a secure Internet portal which does not trace or show user screen names whether from home, your desk at work, or a public library. Finally, Navex Global removes Internet addresses to ensure that anonymity in the Navex Global system is

maintained. Navex Global will not use the information it receives for any purpose other than passing along the information to the appropriate AmeriHealth Caritas' investigations unit.

How does AmeriHealth Caritas investigate reports?

Navex Global notifies the appropriate AmeriHealth Caritas department, either your Local Compliance Office, Corporate Compliance or Corporate and Financial Investigations, when a new report is submitted. Your question or the information in your report is provided to the designated investigation team members, and they begin to investigate the matter promptly and discreetly. Depending on the circumstances, persons who are the subject of a report may eventually be informed that a report involving them was made. In some cases such persons may be able to provide additional or corrective information that resolves your concerns. You may be able to help the investigators and monitor the status of the investigation by calling back to the hotline or by clicking the 'Follow-up' feature on the secure website at www.amerihealth.ethicspoint.com. We note that, in many cases, the need for confidentiality will prevent Navex Global's communications specialist from giving you specific information about the investigation or the results while the matter is still pending. It is expected that you handle any information you may receive about the progress of an investigation as confidential.

What is the 'Follow-up' feature?

Five (5) business days after you submit a report or question, you can check back on the status of that report by calling the hotline again or by using the 'Follow-up' feature on the web-intake portal. When you follow-up on your report you will be able to see if the investigative team needs more information from you. As long as the report is active, both you and the Company's investigators can exchange information and ask questions confidentially. If you ever need to add new information about your report, you will use the 'Follow-up' feature. Simply call back to the toll-free number (800-575-0417) or click the 'Follow up' link at www.amerihealth.ethicspoint.com. You will be asked to provide your unique Report Key and password.

Following up is particularly important if you choose to remain anonymous, because in that case we have no other way to communicate with you.

What happens if I lose my Report Key or password?

Because of the high level of confidentiality that is maintained for inquiries and reports, if you lose your Report Key or password, you will be required to file a new report or inquiry. You should mention in the new report that the matter relates to another report or inquiry that you previously submitted.

What if I face retaliation for filing a report?

While it is unacceptable to file a report knowing that the information is false, AmeriHealth Caritas Family of Companies prohibits retaliation against anyone who reports misconduct or other compliance violation in good faith. If you believe you have faced retaliation for reporting a compliance violation, please report it immediately to your manager, your Local Compliance Office or Corporate Compliance. You can also call the AmeriHealth Caritas corporate compliance hotline at 800-575-0417 or submit a report online via the web-intake portal at www.amerihealth.ethicspoint.com so that the Company can investigate the issue as soon as possible.