

**QHP Issuer Compliance Plan and Organizational Chart
COVER SHEET TEMPLATE**

Issuers will be asked to submit a Compliance Plan as part of the application process for certification of qualified health plan(s). Compliance Plans will be reviewed for completeness and adequacy based on the criteria listed below. Issuers should respond to the evaluation question and, where applicable, state the page number where language supporting the response can be found. This initial evaluation and review cover sheet will be used to evaluate the adequacy of the Compliance Plan and will assist in the ongoing monitoring of issuer compliance.

Certification of a health plan does not prevent CMS from identifying or addressing weaknesses in the Compliance Plan submitted by an issuer as part of its application at a later date.

Evaluation Criteria	Yes	No	Page Number
Attestations			
Applicant attested that it has a Compliance Plan that adheres to all applicable laws, regulations, and guidance, that the Compliance Plan is ready for implementation and that the applicant agrees to adhere to the Compliance Plan submitted with its application.	<input type="radio"/>	<input type="radio"/>	
Applicant attested that it will inform CMS of any significant changes to the organizational chart submitted with its application.	<input type="radio"/>	<input type="radio"/>	
Applicant attested that it will notify and obtain CMS approval prior to making any change in ownership that involve the entity(ies).	<input type="radio"/>	<input type="radio"/>	
Compliance Plan and Organizational Chart Submissions			
Applicant uploaded a copy of its Compliance Plan.	<input type="radio"/>	<input type="radio"/>	
Applicant uploaded a copy of the Organizational Chart.	<input type="radio"/>	<input type="radio"/>	

Evaluation Criteria	Yes	No	Page Number
<p>5. Does the Compliance Plan contain well publicized disciplinary standards?</p> <p>Disciplinary standards may include, but are not limited to, policies such as:</p> <ul style="list-style-type: none"> • The articulation of expectations for reporting compliance issues and providing assistance in their resolution. • The identification of non-compliant or unethical behavior. • The provision for the timely, consistent, and effective enforcement of the defined standards when noncompliance or unethical behavior occurs. 	<input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/>	<input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/>	
<p>6. Does the Compliance Plan include a system for routine monitoring and the identification of compliance risks?</p> <p>Routine monitoring to identify compliance risks may include the following:</p> <ul style="list-style-type: none"> • Is there a provision that addresses internal monitoring and/or audits? • Is there a provision for external audits to evaluate the organization and the overall effectiveness of the compliance program? 	<input type="radio"/> <input type="radio"/> <input type="radio"/>	<input type="radio"/> <input type="radio"/> <input type="radio"/>	
<p>7. Does the Compliance Plan include procedures and a system for prompt responses to compliance issues?</p> <p>Evidence of procedures and/or a system to promptly respond to compliance issues may be identified by the following provisions:</p> <ul style="list-style-type: none"> • Self-evaluations and audits. • Conducting timely and reasonable inquiries into any evidence of misconduct. • Implementing appropriate corrective actions, in response to the potential or actual violation that occur. • Procedures to voluntarily self-report potential fraud, misconduct, or other types of non-compliance. 	<input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/>	<input type="radio"/> <input type="radio"/> <input type="radio"/> <input type="radio"/>	