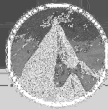
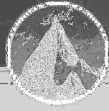


**Innovative Strategies to Measure, Report and  
Improve the Effectiveness of an Ethics and  
Compliance Program**



**Agenda**

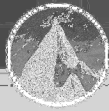
- Centene Corporation
- Ethics & Compliance Structure
- Strategic Direction
- Ethics & Compliance Program Elements
- Metrics, Measures, Reporting & Dashboards
- Questions



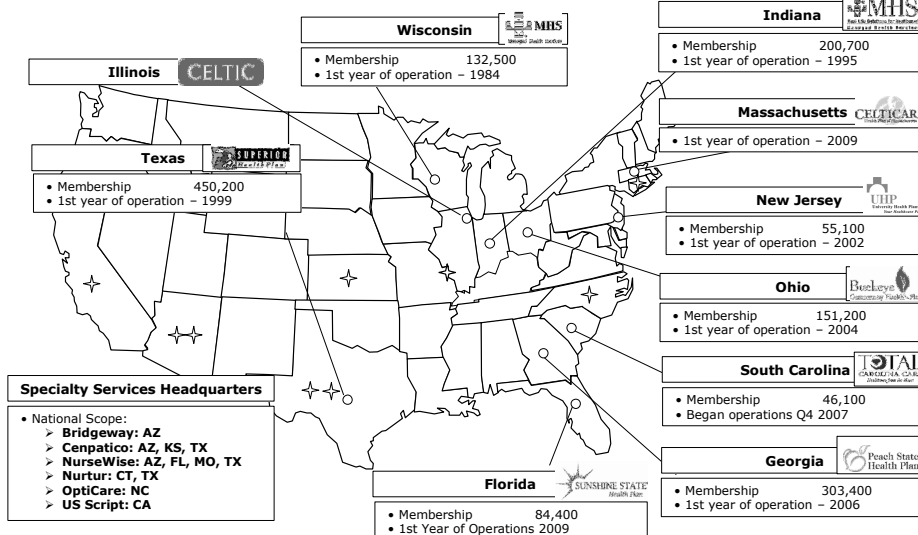
## Who Are We?

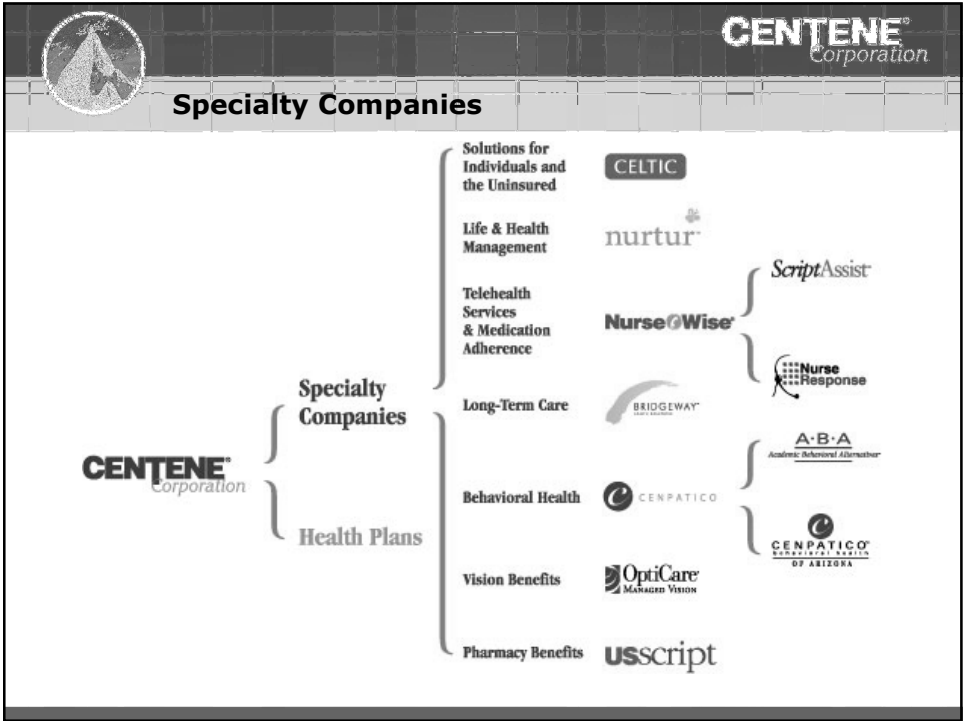
**Centene Corporation is a multi-line  
healthcare enterprise operating  
primarily in two segments:**

**Medicaid Managed Care and Specialty  
Services**



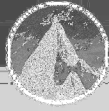
## Established Leader in Existing Markets



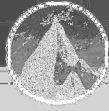
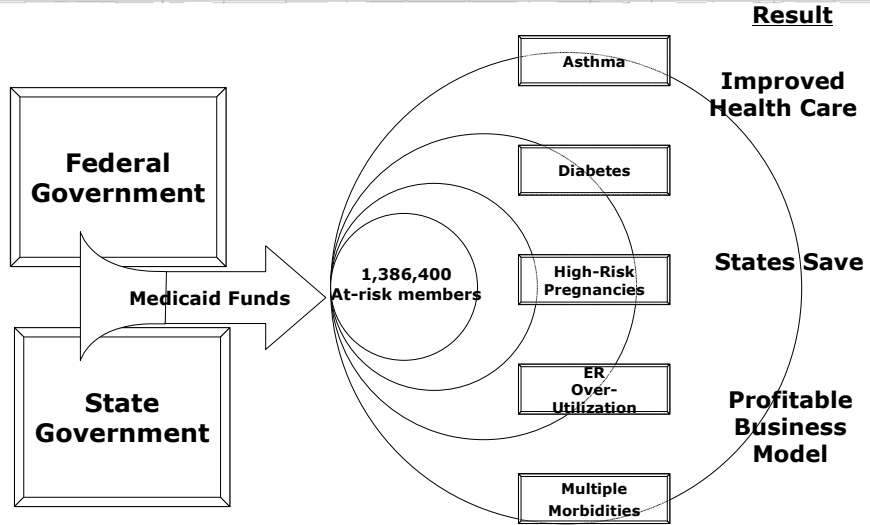


## Market Segments

Customer Segments	Centene Solutions
<b>1. Government Services</b>	<ul style="list-style-type: none"> <li>• <b>Medicaid Managed Care</b></li> <li>• <b>Medicare Special Needs Plans</b></li> <li>• <b>Specialized Programs</b> <ul style="list-style-type: none"> <li>– Foster Care</li> <li>– Behavioral</li> <li>– Long-term Care</li> <li>– Texas Exclusive Provider Organization (EPO)</li> </ul> </li> </ul>
<b>2. Employer Market</b>	<ul style="list-style-type: none"> <li>• <b>Nurtur</b></li> <li>• <b>US Script</b></li> </ul>
<b>3. Healthcare Payors</b>	<ul style="list-style-type: none"> <li>• <b>Opticare</b></li> </ul>
<b>4. Individuals</b>	<ul style="list-style-type: none"> <li>• <b>Celtic Insurance Company</b></li> </ul>

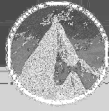


### Centene At a Glance



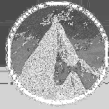
### Guiding Principles: Our Mission Statement

***"Centene will provide better health outcomes at lower costs"***



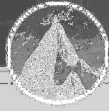
**Guiding Principles: Our Values and Philosophy**

**Mission Focused**  
**Uncompromising Integrity**  
**Growth and Innovation Mindset**  
**Communicate with Candor and Respect**  
**Relentless Execution**



**Master Strategy**

**Centene Corporation will be recognized as a leading multi-line healthcare enterprise by:**

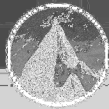


## **Centene Corporation**

“It is the policy of Centene Corporation to conduct its business affairs in accordance with the standards and rules of ethical business conduct and to abide by all applicable laws, both in letter and spirit.

**In this, there is no compromise.”**

-Michael F. Neidorff



## **Ethics & Compliance Department Structure**

### **Ethics & Compliance**

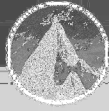
- Code of Conduct
- Regulatory and Contract Compliance

### **Special Investigations Unit**

- Waste, Abuse and Fraud
- Overpayments

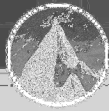
### **Compliance Coding Management**

- Front End Code Editing



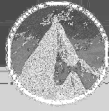
### **Compliance Program in the Beginning**

- Program existed on paper
- No standardization
- Manual processes
- Managed in Excel/Access



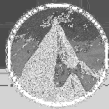
### **Ethics & Compliance Program Strategy**

- Raise awareness
- Proactively detect emerging risks
- Identify, track and monitor issues
- Drive ethics & compliance down in the organization
- Partnership with operations
- Culture of Compliance



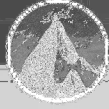
## **Ethics & Compliance Tactical Strategy**

- Electronic vs. Paper
- Automation
- Measurement and leading indicators
- Risk reporting
- Compliance dashboards (visibility)
- Enterprise Risk Management



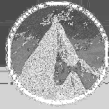
## **Code of Conduct**

- Transitioned annual acknowledgement/disclosure from paper to electronic
- Automated reminders to employees
- Robust reporting to business units for follow-up
- Dashboard Monitoring
- Achieved 100 percent completion rate in 6 weeks (3,800 employees)
- Allows Compliance to focus on disclosures



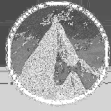
## **Code of Conduct**

### **Examples of tools used to manage the Code of Conduct**



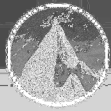
## **Risk Reporting**

- Automated tracking and report reminders
- Systematic reporting process
- Effective document management
- Executive dashboards (real-time)
  - Corporate
  - Local



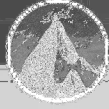
## **Risk Reporting**

### **Examples of tools used to manage Risk Reporting**



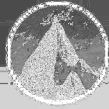
## **Compliance Assessments**

- Standardized process
- Central repository to house compliance requirements
- Integration with 3rd Party content provider
- Allows distributed assessments via email



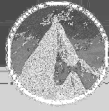
## **Compliance Assessments**

- Virtual evidence room of compliance documentation
- Systematic tracking status of GAPs and Corrective Action Plans
- Systematic reporting
- Dashboard reporting



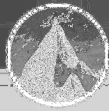
## **Compliance Assessments**

**Examples of tools used to manage  
Compliance Assessments**



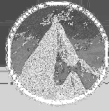
## Cultural Diagnostic

- Voluntary survey sent to all employees
- Anonymous, hosted by a outside 3rd Party
- 70 questions that focus on the effectiveness of the compliance program across 12 categories
  - Tone at the top
  - Comfort raising concerns
  - Trust of managers and co-workers
  - Job satisfaction
- 61 percent response rate
- Business unit analysis



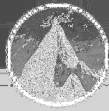
## Cultural Diagnostic

### Examples of Cultural Diagnostic Results



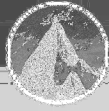
### **Cultural Diagnostic – Actions Taken**

- Training for managers
- Training for all employees
- Speaking up policy
- Focus groups
- Cross functional involvement
- More frequent surveys



### **Education and Training**

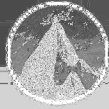
- Chairman & CEO Code of Conduct Training
- Manager Training
  - Computer based training
  - Handbook and quick tip sheet
  - Meeting in a box
- Employee Training
  - Computer based training
  - Annual inservice training
  - Games/contests



**Compliance Jeopardy**

Privacy	BECP	Security	Potpourri	Pop Compliance
<u>\$100</u>	<u>\$100</u>	<u>\$100</u>	<u>\$100</u>	<u>\$100</u>
<u>\$200</u>	<u>\$200</u>	<u>\$200</u>	<u>\$200</u>	<u>\$200</u>
<u>\$300</u>	<u>\$300</u>	<u>\$300</u>	<u>\$300</u>	<u>\$300</u>
<u>\$400</u>	<u>\$400</u>	<u>\$400</u>	<u>\$400</u>	<u>\$400</u>
<u>\$500</u>	<u>\$500</u>	<u>\$500</u>	<u>\$500</u>	<u>\$500</u>

**Final Jeopardy**



**Who Wants to be an Ethics & Compliance Millionaire**




Welcome to:  
***Who Wants to be  
an Ethics &  
Compliance  
Millionaire***


- 15 ○ \$1 Million
- 14 ○ \$500,000
- 13 ○ \$250,000
- 12 ○ \$125,000
- 11 ○ \$64,000
- 10 ○ \$32,000
- 9 ○ \$16,000
- 8 ○ \$8,000
- 7 ○ \$4,000
- 6 ○ \$2,000
- 5 ○ \$1,000
- 4 ○ \$500
- 3 ○ \$300
- 2 ○ \$200
- 1 ○ \$100

**These include gifts, sporting event tickets, lunches or dinners received from vendors or suppliers.**

15	<input type="radio"/>	\$1 Million
14	<input type="radio"/>	\$500,000
13	<input type="radio"/>	\$250,000
12	<input type="radio"/>	\$125,000
11	<input type="radio"/>	\$64,000
10	<input type="radio"/>	\$32,000
9	<input type="radio"/>	\$16,000
8	<input type="radio"/>	\$8,000
7	<input type="radio"/>	\$4,000
6	<input type="radio"/>	\$2,000
5	<input type="radio"/>	\$1,000
4	<input type="radio"/>	\$500
3	<input type="radio"/>	\$300
2	<input type="radio"/>	\$200
1	<input type="radio"/>	\$100

50:50



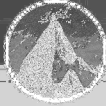



1: Business Courtesies

2: Kickback

3: Reward

4: Incentives

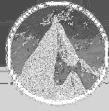




**Compliance Week: Acting with Integrity Means...**

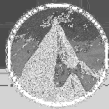
living everyday with a set of values that you apply to every aspect of your life. It is providing the same level of respect and honesty to your coworkers that you give to your family and loved ones. It is a full time job with no vacation, no personal time, and you always take your work home with you. Part timers need not apply. When you act with integrity, you stand up for what is right, even if it leaves you standing alone. Luckily, at Centene you never stand alone.

**Debra S.**  
 Member Services Representative  
 Superior Health Plan



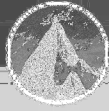
## **Regulatory Reporting and Licensing**

- Annual, quarterly, monthly report tracking
- Automated reminders
- Licensing document retention
- Regulatory report retention
- Document approval tracking



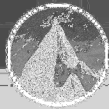
## **Regulatory Reporting and Licensing**

**Examples of tools used to manage  
Regulatory Reporting and Licensing**



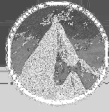
## **Policies and Procedures**

- Decentralized management
- Electronic approval process
- Automated tracking
- Version control
- Systematic reporting
- Searchable database



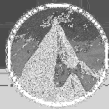
## **Policies and Procedures**

**Examples of tools used to manage  
Policies and Procedures**



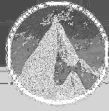
## Enterprise Risk Management

- Entity level risks are linked to both regulatory and contractual requirements
- Entity level risks are directly mapped to corporate level risks
- Risks have measurable controls that are track
- Risks are assessed by Risk Champions quarterly and reported to BOD



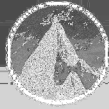
## Enterprise Risk Management

**Examples of tools used to manage  
Enterprise Risk Management**



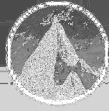
## **Program Efficiencies**

- Eliminated sanctions for late report filings and failures to notify
- Improved policy and procedure compliance from 15 percent to 98 percent at one subsidiary
- Improved compliance with state requirements for complaint tracking from 15 percent non-compliance to 100 percent compliance
- Reduced time spent managing policies and procedures by 95 percent
- Reduced time spent on corrective actions by 70 percent
- Reduced time spent preparing annual regulatory reports by 75 percent



## **Summary**

- Centene Corporation
- Ethics & Compliance Structure
- Strategic Direction
- Ethics & Compliance Program Elements
- Metrics, Measures, Reporting & Dashboards



**Questions?**

**Robert Miromonti**  
**Vice President, Ethics & Compliance**  
**Centene Corporation**  
**(314) 725-4477 ext. 25403**  
**[rmiromonti@centene.com](mailto:rmiromonti@centene.com)**