

## QHP Issuer Compliance Plan and Organizational Chart

### Review Cover Sheet

*Submit a Compliance Plan and Organizational Chart as part of your QHP Application. We review Compliance Plans based on criteria listed below. Respond to the evaluation criteria and, where applicable, state the page number where language supporting the response can be found. We will use this initial evaluation and review cover sheet to evaluate the adequacy of the Compliance Plan and Organizational Chart and to help us monitor ongoing compliance.*

*We reserve the right to identify weaknesses in your Compliance Plan or the Organizational Chart and to require you to address those weaknesses at a later date.*

Evaluation Criteria	Yes	No	Page Number
<b>Compliance Plan and Organizational Chart Submissions</b>			
Applicant included a completed PY2023 cover sheet in the QHP application.			N/A
Applicant uploaded a copy of its Compliance Plan.			N/A
Applicant uploaded a copy of the Organizational Chart.			N/A
<b>Compliance Plan Contents</b>			
<b>A. Written Policies and Procedures</b>			
1. Does the Compliance Plan include a statement that articulates the issuer's commitment to comply with all applicable federal and state rules, regulations, and standards?			
2. Does the Compliance Plan include written standards of conduct for employees?			
3. Does the Compliance Plan provide guidance for employees, contractors, subcontractors, or other applicable entities on the process for dealing with potential compliance issues?			
4. Does the Compliance Plan describe the methods, processes, and procedures used to implement the Compliance Program?			

Evaluation Criteria	Yes	No	Page Number
5. Does the Compliance Plan include a general statement indicating compliance with Exchange requirements (e.g., issuer will support and facilitate compliance with Exchange requirements)?			
6. Does the Compliance Plan include a description of plans or processes to comply with specific Exchange requirements (e.g., issuer will implement internal processes and work plans to ensure ongoing compliance with specific Exchange requirements)?			
<b>B. Designated Chief Compliance Officer and Other Appropriate Bodies (such as a compliance committee)</b>			
1. Does the submitted Organizational Chart document that the Compliance Officer reports directly to the Board of Directors or other senior governing body (e.g., C-level executive or Director)?			
2. Do the submitted Compliance Plan and the Organizational Chart <b>both</b> include the Compliance Officer?			
<b>C. Effective Education and Training</b>			
1. Does the Compliance Plan include an <b>annual</b> compliance training and education component?			
2. Does the Compliance Plan describe the following elements of training and education:			
a. A description of training program contents?			
b. Which employees or entities will receive the training?			
c. The frequency with which training is held (e.g., annual, bi-annual, semi-annual)?			
<b>D. Developing Effective Lines of Communication</b>			
1. Does the Compliance Plan include methods and channels for reporting potential compliance problems anonymously (e.g., an employee may choose to report potential compliance problems through the anonymous telephone hotline)?			
2. Does the Compliance Plan include information on how to seek clarification on issues directly from the compliance officer or a member of the compliance committee?			
3. Does the Compliance Plan include a policy of non-retaliation against employees reporting potential problems?			
4. Does the Compliance Plan assure, to the extent possible, confidentiality in all reporting processes (e.g., the issuer allows employees to make confidential reports of potential compliance problems through a hotline or directly to the Compliance Officer)?			

Evaluation Criteria	Yes	No	Page Number
<b>E. Disciplinary Guidelines</b>			
1. Does the Compliance Plan include a reference to written policies and procedures related to disciplinary standards that are distributed to employees?			
2. Does the Compliance Plan include a description of the range of disciplinary actions that may be imposed on those who have failed to comply with the standards of conduct, policies and procedures, or federal and state laws (e.g., issuer will enforce a range of disciplinary actions from a verbal warning up to termination)?			
<b>F. Audits and Evaluation Techniques to Monitor Compliance</b>			
1. Does the Compliance Plan include a system for routine monitoring and identifying compliance risks?			
2. Does the Compliance Plan include a process for evaluating and improving the issuer's organization's compliance program?			
<b>G. Investigation of and Response to Potential Compliance Issues</b>			
1. Does the Compliance Plan describe the process for reporting potential compliance issues to the appropriate personnel and/or governmental authority within a reasonable period?			
2. Does the Compliance Plan describe a process for conducting timely and reasonable investigations of potential compliance issues to determine whether a violation of applicable law or the compliance program has occurred?			
3. Does the Compliance Plan describe a process for taking steps to correct confirmed violations of applicable law or the compliance program?			