



ARKCONSULTING
GROUP

Compliance Program Handbook

2022-2023 Attestation



Introduction

The principal purpose of the Ark Consulting Group Inc. Compliance Program is to promote and facilitate corporate governance of operations and services rendered in accordance with established laws, regulatory requirements, and the Policies and Procedures of Ark Consulting Group Inc. (“Ark Consulting Group Inc.”). The Compliance Program ensures the business operations, of every individual who conducts business for or on behalf of Ark Consulting Group Inc. reflect the values, integrity, and commitment to compliance that Ark Consulting Group Inc. strives to meet.

Responsibilities and Obligations

Ark Consulting Group Inc. Compliance Program is guided by the principles contained within our contracted carrier’s corporate responsibilities and compliance programs. It includes the 7 key elements of an effective compliance program (see below) which will foster a culture that promotes prevention and detection of conduct that does not conform to the laws, regulations and company policies associated with government-funded healthcare programs. These 7 key elements include:

1. **Written Policies and Procedures** – The policies and procedures of Ark Consulting Group Inc. serve as a guide for its employees, contracted agents, and business partners regarding compliance standards and the procedures and practices relating to compliance.
2. **Compliance Officer and Committee** – An effective compliance program must have a compliance officer to oversee the entire program. The compliance officer’s responsibilities include developing, operating, and monitoring the compliance program; along with reporting to the compliance committee on a periodic and as needed basis. The compliance officer will also be responsible for coordinating and participating in the training of all employees, independently investigating compliance matters, and ensuring that any necessary corrective action is taken.
3. **Effective Training and Education** – A necessary component of every compliance program is proper and periodic training. This training and education should help all individuals who do work on behalf of Ark Consulting Group Inc. and understand the laws, regulations, and policies applicable to their day to day business activities. All employees will be trained to ensure they have gained the necessary knowledge of all laws, regulations, and best practices of a successful Compliance Program and will attest to doing so. The mandatory training will consist of AHIP which will cover Fraud, Waste + Abuse and Medicare Processes and Procedures to abide by.
4. **Effective Lines of Communication (including anonymous reporting function)** – Effective lines of communication are imperative to the success of any business operation, and a



compliance program is no different. The compliance officer must effectively create and maintain effective lines of communication. It is crucial to the success of the program that all employees and staff have an effective way to ask questions and report concerns or violations when the need arises. It is Ark Consulting Group Inc. who hopes that everyone will take an active role and communicate openly when an issue or question arises. This is an ongoing process and changes and revisions will be made on an as needed basis.

- 5. Internal Monitoring and Auditing** – There will be ongoing evaluation and monitoring of the compliance program to ensure its effectiveness. Ark Consulting Group Inc. will utilize multiple avenues for internal monitoring and auditing purposes. Information gathered from the evaluation process may result in correction and/or modification of these processes. Internal Monitoring is done using many tools and resources. These include but are not limited to compliance reports, agent complaint notifications and audits administered by our Carriers. We review such reports and administer the necessary training / re-education and make the necessary amendments to our compliance program, if needed.

Furthermore, our marketers are in constant communication with their agents which is also a vital resource for our internal monitoring as they can monitor lead generation, sales compliance, unusual sales trends, proper marketing practices, etc. We also will communicate compliance related matters, immediately as we receive them for each of our First-Tier Downstream entities so they can communicate the information to their down-lines respectively. This helps streamline the communication from the top to the bottom of our hierarchies.

- 6. Disciplinary Enforcement** – Depending on the severity of violations, re-training, and disciplinary actions up to and including termination may be taken if the monitoring and auditing process uncovers any egregious compliance errors.
- 7. Mechanisms for Responding to and Reporting Detected Problems** – All reports and/or indications of suspected noncompliance will result in an immediate investigation to determine whether there has been a violation of law or other requirements; and, if so, make sure all affected parties are notified of the breach, and do everything possible to correct/minimize the severity of the violation.

Structure and Membership of FMO Compliance Organizations

As mentioned earlier, the Compliance Officer will be the head of the Compliance Program. He/She will be responsible for everything regarding compliance. It is their responsibility to keep the lines of communication open and fluid, not only with employees, but with senior management as well. Also, they are responsible for training and educating all employees regarding compliance.



However, the success of any compliance program depends on the diligence of everyone involved to be aware of all rules and regulations and adhere to them, as well as help monitor for possible breaches and violations, and if any are found report them immediately.

Knowledge of Regulations and Ark Consulting Group Inc. Policies

Ark Consulting Group Inc. Compliance Program will work to establish and maintain an inventory of applicable policies and procedures, regulations, and guidance documents applicable to the day-to-day duties of Ark Consulting Group Inc. employees and contracted agents. Additionally, broader, more general compliance requirements pertaining to, but not limited to, Information Security, Records Management, and Privacy and Security Awareness will be addressed in these policies and procedures as well. These will include, but are not limited to, HIPAA regulations, CMS guidelines, and Federal, State, and/or Local laws and regulations.

Oversight of FMO Compliance Program

To help ensure the success of the Compliance Program, Ark Consulting Group Inc. will conduct periodic reviews and audits of compliance operations and performance. The goal of this internal monitoring is to uncover any non-compliance issues, so they can be addressed internally, and can hopefully be rectified before an actual breach of compliance occurs. This should act as an internal checks and balances system to help ensure the success of the Compliance Program. Also, certain carriers Ark Consulting Group Inc. is contracted with will aide in the monitoring and auditing of the Compliance Program to ensure the entire FMO channel is remaining compliant.



Policy Name: Policy on Policies
Version Number: 1.0
Date of Revision: 1-11-2020

Policy on Policies

I. POLICY APPLICABILITY

Stakeholders	Products	Functional Owners
Ark Consulting Group Inc. Employees/Staff/ Agents	<ol style="list-style-type: none">1. All companies with federally regulated products and Prescription Drug Plans (PDP) including all Medicare Advantage, Special Needs Plans, and Prescription Drug Plans2. All Health and Accident companies with state regulated products including all Medicare Supplement Insurance Plans, Long Term Care, Disability Plans, and Critical Illness Plans3. All Life Insurance companies with state regulated Life Insurance Plans, Annuities, Single Pay, Final Expense and Burial.	Vince A Lanni

II. POLICY STATEMENT

Ark Consulting Group Inc. is committed to achieving and maintaining world-class levels of corporate governance and ethical business conduct. Our goal is to advance a company culture that fosters a real dedication to care and serve, to innovate and grow, and to meet our high standards of business practice and performance.

III. POLICY PURPOSE (Scope)

The policies and procedures created and implemented by Ark Consulting Group Inc. should provide clear guidance to all workforce members about our obligations under the law and how we do business.

IV. POLICY DEFINITIONS



All of Ark Consulting Group Inc. administrative staff and marketing teams shall herein be referred to as: “Staff”, “Employee”, OR “Sub-Contractor”

Ark Consulting Group Inc. shall be referred to as: “Ark Consulting Group Inc.”

All external agents/ staff/ manager’s/business entities contracted under The Ark Consulting Group Inc. are referred to as: “Agent(s)”

V. POLICY PROVISIONS and EXHIBITS (Procedure)

1. All policies shall be created utilizing high ethical standards and in accordance with all laws, rules, and regulations that Ark Consulting Group Inc. is governed by. This includes, but is not limited to, regulations set forth by HIPAA and the HITECH Act, as well as CMS and governmental standards that apply to insurance and the insurance marketing industry. Such policies shall also be created to implement good business practices and general business ethics.
2. Policies will be reviewed and approved by the Compliance Director and Principal of the firm annually and as needed from our carrier partners.
3. All policies and procedures shall be distributed to, or made otherwise available to, the entire staff and any agents that shall be under Ark Consulting Group Inc. hierarchy.
4. All policies and procedures shall be updated and amended, as needed and annually at a minimum, pertaining to changes in origin of the policy, regulatory changes, need or as required by law.
5. All policies and procedures shall be regularly maintained and secured and shall be stored with other important business records for safekeeping for 10 years.
6. All members of the staff are required to read, understand, and comply with this and all other policies and procedures created and implemented by Ark Consulting Group Inc.

VI. MONITORING AND ENFORCEMENT

All employees/Sub-Contractors are responsible for enforcing and upholding this policy. Employees/Sub-Contractors who violate this policy are subject to discipline up to and including termination in accordance with Ark Consulting Group Inc. Corrective and Disciplinary Action Policy.



Policy Name: Privacy and Security
Version Number 1.0
Last Revised: 1-11-2020

Privacy and Security Policy

I. POLICY APPLICABILITY

Stakeholders	Products	Functional Owners
Ark Consulting Group Inc. Employees/Staff Agents	<ol style="list-style-type: none">1. All companies with federally regulated insurance products including all Medicare Advantage, Special Needs Plans, and Prescription Drug Plans2. All Health and Accident companies with state regulated products including all Medicare Supplement Insurance Plans, Long Term Care, Disability Plans, and Critical Illness Plans3. All Life Insurance companies with state regulated Life Insurance Plans, Annuities, Single Pay, Final Expense and Burial Trusts.	Vince A Lanni

II. POLICY STATEMENT

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III. POLICY PURPOSE (Scope)

The objective of our Privacy and Security policies is to manage all personal information responsibly and legally and to serve our business objectives and help build trust with stakeholders.

IV. POLICY DEFINITIONS

All of Ark Consulting Group Inc. administrative staff and marketing teams shall herein be referred to as: "Staff" or "Employee" OR "Sub-Contractor" Ark Consulting Group Inc. shall be referred to as: "Ark Consulting Group Inc."



All external agents/ staff/ manager's/business entities contracted under Ark Consulting Group Inc. are referred to as: "Agent(s)"

All companies represented by Ark Consulting Group Inc. is referred to as "Company or Carrier" Centers for Medicare and Medicaid Services shall be referred to as: CMS Health Insurance Portability and Accountability Act of 1996 shall be referred to as: "HIPAA" Health Information Technology for Economic and Clinical Health Act of 2009 shall be referred to as "HITECH"

Business Organization – is a Business Group, Business Segment, Business Unit, or Corporate Department.

Personal Information – is information about an individual

1. that is created or received by or on behalf of a Business Organization; and
2. that identifies the individual, or with respect to which there is a reasonable basis to believe the information can be used to identify the individual.

By way of example, Personal Information includes "Protected Health Information" (PHI) and "electronic Personal Health Information" (EPHI) as defined and regulated in the HIPAA Privacy Rule, "Non-public personal information" as defined and regulated in the Gramm-Leach-Bliley Act, and "personal data" under Directive 95/46/EC of the European Parliament.

V. POLICY PROVISIONS and EXHIBITS (Procedure)

1. Management and Accountability

- 1.1. All employees and agents of Ark Consulting Group Inc. are responsible for understanding and complying with applicable laws and regulations that protect the privacy and security of Personal Information about members, customers, employees, and business partners. All employees must collect, use, and disclose Personal Information in a manner consistent with applicable laws in the countries in which we do business.
- 1.2. Each employee and agent within Ark Consulting Group Inc. hierarchy is responsible for monitoring and ensuring compliance with this Policy by the business operations for which the person or organization is responsible, and for ensuring that this Policy is communicated to all employees, contract workers, temporary staff and others who have access to Personal Information on behalf of Ark Consulting Group Inc. and who report directly to or up through the manager.
- 1.3. Each organization within Ark Consulting Group Inc. hierarchy is responsible for identifying the applicable local privacy laws, identifying the Personal Information and sensitive Personal Information in their operations, and developing policies, procedures, standards, and guidelines for meeting the requirements of this Policy and local law.



2. Collection

- 2.1 Each employee, agent, and organization under Ark Consulting Group Inc. will collect Personal Information lawfully and will require the same of third parties that collect information on their behalf.
- 2.2 The collection of Personal Information should be limited to that which is relevant and appropriate for the purposes of providing a product or service, employment of individuals or engagement of contract workers and temporary staff or is required by law.
- 2.3 The definition of sensitive Personal Information varies across jurisdictions and can include information regarding race, ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexual life, commission or alleged commission of offenses, court proceedings, financial information, government-issued identification numbers (such as social security numbers), and more. Ark Consulting Group Inc. will limit the collection of sensitive Personal Information to that related to a legitimate business purpose. Where required by law, Ark Consulting Group Inc. will collect sensitive Personal Information only with the consent of the individual.

3. Use and Retention

- 3.1 Ark Consulting Group Inc. will only use and store Personal Information for legitimate business purposes consistent with this Policy, legal requirements, and any applicable privacy notices provided to the individual. All staff that has read and signed
- 3.2 Code of Conduct, which includes a confidentiality agreement, will have access to all agent/client files by way of our agency management system and/or paper files on an as needed basis. Use of these files will be for legal business practices only.
- 3.2. Upon request, Ark Consulting Group Inc. will, in good faith, share these files with its Carrier's to satisfy day-to-day business operations.
- 3.3. Ark Consulting Group Inc. will retain Personal Information used to meet business needs and satisfy legal requirements. Agents and Business Organizations under Ark Consulting Group Inc. are responsible for developing reasonable policies and procedures for the retention and secure disposal of Personal Information in accordance with applicable law and in conformance with the Information Risk Management and Information Security policies and our companies' Records and Information Management Retention Policies and Retention Schedules.



3.4. All records related to the sale of Medicare products (including marketing materials) will be maintained for a period of no less than 10 years plus the current contract year. As of 2014, all records pertaining to the sale of Medicare products have been and will be stored electronically. Prior to 2016, these records were/are kept in paper form in a securely locked room.

4. Security

4.1. Ark Consulting Group Inc. will establish, implement, and monitor reasonable administrative, physical, and technical information security safeguards to protect Personal Information, based on its sensitivity and criticality, from unauthorized access, disclosure, corruption, or loss.

5. Data Quality

5.1. Ark Consulting Group Inc. will take reasonable actions to maintain accurate, complete, and up-to-date Personal Information.

6. Monitoring and Enforcement

6.1. Every employee and agent are responsible for compliance with privacy laws, as well as for promptly raising any concerns about possible violations of this Policy. If you are aware of a situation that you believe may be in violation of this Policy or otherwise unlawful, you should immediately contact your manager and the compliance officer.

6.2. Ark Consulting Group Inc. will promptly report any breaches of this Policy and its supporting guidelines to both the Legal Department and the Privacy Office of the company that is involved (see Appendix A). In cooperation with the Privacy Office, Business Organizations are responsible for investigating reported incidents and taking appropriate actions and notification, if required, stemming from reported privacy incidents. Business Organizations will keep the Privacy Office informed of all investigations, results, employee discipline, legal action, and risk mitigation involved.

6.3. Ark Consulting Group Inc. must review controls relevant to the implementation of this Policy for their effectiveness.

6.4. Ark Consulting Group Inc. management will address privacy complaints following an established process.



6.5. If Ark Consulting Group Inc. or one of its carriers determines that a staff member or agent has violated this Policy, that person will be subject to discipline. Discipline may include warnings, retraining, suspension with or without pay, and/or termination. Factors to be considered in assessing disciplinary actions include, but are not limited to: the extent of the violation, the nature of the violation (accidental, inadvertent, or purposeful misconduct), the potential harm or risk created by the disclosure for the individuals whose information was released, the client, company or other data source, or the Business Organization, whether the employee self-reported and was forthcoming in the investigation and whether there has been repeated or purposeful misconduct or violations of the carrier or Business Organization policies and procedures by the employee. The discipline to be applied in an individual case will be reviewed at senior management level to ensure that the consequences are appropriate.

7. Conflict of Interest Policy

7.1. Generally, conflicts of interests occur when an individual's private interests interfere or appear to interfere with the interests of the company. Conflicts of Interests can be defined as any situation in which an individual or corporation is able to exploit a professional or official capacity in some way for their personal or corporate benefit. All employees, officers and directors of Ark Consulting Group Inc. as well as its business affiliates are expected to use the highest ethical standards when handling situations that could affect – or appear to affect – the integrity of Ark Consulting Group Inc. Merely an appearance of a Conflict of Interest can adversely affect the reputation of the company. Ark Consulting Group Inc. staff is expected and required to be aware of any Conflicts of Interests that may exist and report them to the proper authority.

7.2. Furthermore, any employee taking part in political activities or committees must make it known that their views and actions are strictly their own and don't reflect those of the Company, unless the Company has requested and approved of the activities. Activities outside of the workplace should in no way interfere with or reflect negatively upon the Company.

8. Other Privacy Policies

8.1. This Policy operates in conjunction with other privacy policies of Ark Consulting Group Inc. and all carriers that Ark Consulting Group Inc. represents and requires compliance with such other privacy policies.



Policy Name: Agent Oversight
Version Number: 1.0
Last Revised: 1-11-2020

Agent Oversight

I. POLICY APPLICABILITY

Stakeholders	Products	Functional Owners
Ark Consulting Group Inc. Employees/Staff Agents	<ol style="list-style-type: none">1. All companies with federally regulated products and Prescription Drug Plans (PDP) including all Medicare Advantage, Special Needs Plans, and Prescription Drug Plans2. All Health and Accident companies with state regulated products including all Medicare Supplement Insurance Plans, Long Term Care, Disability Plans, and Critical Illness3. All Life Insurance companies with state regulated Life Insurance Plans, Annuities, Single Pay, Final Expense and Burial.	Vince A Lanni

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Ark Consulting Group Inc. shall be referred to as: “Ark Consulting Group Inc.”



All external agents/ staff/ manager's/business entities contracted under The Ark Consulting Group Inc. are referred to as: "Agent(s)"

All companies represented by Ark Consulting Group Inc. is referred to as "Company or Carrier" Centers for Medicare and Medicaid Services shall be referred to as: CMS

Health Insurance Portability and Accountability Act of 1996 shall be referred to as: "HIPAA"

Health Information Technology for Economic and Clinical Health Act of 2009 shall be

referred to as "HITECH" The term "Marketer" will refer to an employee of Ark Consulting Group Inc. that works with agents in our hierarchy to provide product knowledge, agent support, answer questions, offer advice, etc.

V. POLICY PROVISIONS

1. Every Agent who is contracting under Ark Consulting Group Inc. hierarchy is required to provide a current and state appropriate insurance license. Aside from having the appropriate licenses, all agents must also complete the appropriate product certifications and be appointed in the applicable states to be compensated for the sale of federally regulated Medicare products. When required by carriers, the agent is also responsible for maintaining Errors and Omissions insurance and providing Ark Consulting Group Inc. with a current copy of such coverage.
2. Ark Consulting Group Inc. depends entirely on the resources of our Companies to provide us with applications, brochures and marketing materials deemed necessary for our agents to conduct business in compliance with laws and regulations of being an insurance agent. Appropriate supplies are distributed to agents either by requesting them directly from the company or from Ark Consulting Group Inc. office. All marketing materials used must be approved by CMS and follow the regulations regarding their use. Failure to comply with these regulations may result in withholding or withdrawing of commissions, retraining, suspension of marketing privileges, termination, and/or reporting of misconduct to the respective State Departments of Insurance.
3. Every Agent contracted under Ark Consulting Group Inc. must adhere to the regulated guidelines regarding the marketing and selling of all Medicare regulated products. These products include but are not limited to Medicare Advantage Plans and Prescription Drug Plans. These products have specific regulations as to how/when they can be marketed, sold, and submitted. It is imperative that all agents are aware of these regulations and follow them. Corrective action, up to and including termination, may result in cases of non-compliance with these regulations.
4. It is a CMS requirement that all sales and marketing events be reported to CMS. Therefore, agents are required to report any sales meetings or events in which they are presenting to a group of customers. They must report the event by the 20th of the month



prior to the date of the sales event (or as CMS requires). Cancellations or changes to the sales event must be made 48 hours prior to the event or as CMS permits or allows. All agents must adhere to each carrier's individual regulations regarding the process of reporting sales events and meetings.

5. In conducting Medicare Advantage (MA or MAPD) or Prescription Drug Plans (Part D or PDP) marketing activities, all agents are required to follow all CMS and plan sponsor guidelines about Scope of Appointment. Agents may not market any healthcare related product during a marketing appointment beyond the scope agreed upon by the beneficiary prior to the appointment. Generally, agents must document a scope of appointment 48 hours before a personal/individual marketing appointment takes place, unless extenuating circumstances exist.
6. In the occurrence applications for insurance coverage written by agents under Ark Consulting Group Inc. hierarchy are submitted to Ark Consulting Group Inc. office, they are reviewed by administrative staff for accuracy, completeness, and legibility. Each application will be checked to ensure all appropriate forms are attached, such as Scope of Appointment, Replacement forms, and suitability forms. Application information is verified against agent records to ensure proper licensing, appointment, and certification before Ark Consulting Group Inc. submits applications to the carriers. If customer information is not accurate or illegible, an administrative person will take immediate action to contact the agent.

Certain products are regulated by CMS and therefore have regulations on the timeliness of their submission. These products include but are not limited to Medicare Advantage Plans (MA) and Prescription Drug Plans (PDP). For these regulated products, it is required that the **Completed** Enrollment Request Forms be submitted by our carriers to CMS within 24-48hrs. from the agent signature date. In turn, our carriers, or the plan sponsors, place time constraints on their writing agents as well to give them ample time to get the completed application sent to CMS. Most require that the **Completed** Enrollment Request Forms be submitted to them (plan sponsor) within 24 hours of the agent signature date.

7. Marketers at Ark Consulting Group Inc. communicate directly with their individual agents or those agents' up-lines to offer them product knowledge, agent support, answer questions, offer advice on effective and proper selling practices, advice or instruction regarding compliance, or anything else they may deem necessary. Furthermore, if the need arises to communicate any information across our hierarchy, all applicable agents and agencies in our down line will be notified via email, webinar and/or phone. This information can include anything from wholesale industry changes or updates to new training or



education or any other information Ark Consulting Group Inc. considers significant enough to disperse to the entire agent base that is affected by said information.

All reports provided by our carriers will be reviewed by the appropriate individual, department, committee, etc. to identify any potential risks that may need to be addressed. These reports include but are not limited to production or performance reports, compliance reports, member complaints, report cards, scorecards, etc. Once the risk or risks have been identified, these risk areas will be communicated to the applicable marketing team so they can communicate the risk to the appropriate individual in their down-line as well as offer support efforts to rectify the situation.

If for some reason Ark Consulting Group Inc. receives a member grievance directly, the same actions will be taken, and the applicable carrier or carriers will be notified.

7. To comply with the contracts of our carriers, it is Ark Consulting Group Inc. policy to report all agent contract terminations (whether “For Cause or “Not for Cause”) that are unbeknownst to the carrier and instigated at or below our level to the appropriate carriers for review.

8. Unless requested otherwise, Ark Consulting Group Inc. will check all non-agent staff against the [OIG List of Excluded Individuals and Entities](#) and the [SAM Excluded Parties List System](#) at the time of initial hire and monthly thereafter (See Below)

[OIG List of Excluded Individuals and Entities \(LEIE\)](#)

[GSA’s System for Award Management \(SAM\)](#)

Screenshots of each search will be saved for documentation purposes. Each Carrier is responsible for checking their respective agents against these lists. Should we find an individual who is on either of these lists, that individual will be immediately removed from all activity related to Medicare products and the applicable Carrier or Carriers will be notified of the finding.

9. It is also the policy of Ark Consulting Group Inc. to perform background checks on all non-agent staff members as part of the on boarding process. Ark Consulting Group Inc. has contracted with the background screening company Hire’s. The background check will consist of County, State and Federal Criminal Records, employment verification, and a credit history check. If any negative response is found, it will be handled internally by the appropriate authorities. In such a case, Ark Consulting Group Inc. reserves the right to alter the employment with said employee as they see fit, up to and including termination of the agreement.



VI. COMPENSATION FOR MA, MA-PD, AND PDP

1. "Compensation," as defined by CMS in sections 422.2274 and 423.2274 of the Federal Code of Regulations, includes pecuniary or no pecuniary remuneration of any kind relating to the sale or renewal of a policy including, but not limited to, commissions, bonuses, gifts, prizes, awards, and finder's fees. "Compensation" does not include the payment of fees to comply with State appointment laws, training, certification, and testing costs; reimbursement for mileage to, and from, appointments with beneficiaries; or reimbursement for actual costs associated with beneficiary sales appointments such as venue rent, snacks, and materials. These guidelines also state that for 2010 and subsequent years, the compensation amount paid to an agent or broker for enrollment of a Medicare beneficiary into an MA plan is: (A) For an initial enrollment, the prior year's initial compensation adjusted by the change in MA rates that CMS announces each year. (B) For renewals, an amount equal to 50 percent of the initial compensation in (A). Also, for enrollment of a Medicare beneficiary into a PDP is: (A) For an initial enrollment, the prior year's initial compensation adjusted by the change in Part D rates that CMS announces each year. (B) For renewals, an amount equal to 50 percent of the initial compensation in (A).
2. In a 6-year compensation cycle, the broker and/or agent is paid a renewal compensation for each of the next 5 years the enrollee remains in the plan in an amount equal to 50 percent of the initial year compensation amount which creates a 6-year compensation cycle. The cycle begins when the beneficiary initially enrolls in the MA, MA-PD, or PDP plan. Compensation is regulated through year six and ends thereafter.
3. In a 10-year compensation cycle, the broker and/or agent is paid a renewal compensation for each of the next 9 years the enrollee remains in the plan in an amount equal to 50 percent of the initial year compensation amount which creates a 10-year compensation cycle. The cycle begins when the beneficiary initially enrolls in the MA, MA-PD, or PDP plan. Compensation is regulated through year ten and can be lifetime if the member remains in plan.
4. For agents that do not have a direct contract with the MA Company, a contract and commission schedule is provided by Ark Consulting Group Inc. Ark Consulting Group Inc. follows the compensation structure recommended by the respective Carrier. The commission schedule lists the company and the product type and specifies what the initial commission is and what the commission will be for the following 5 years (6-year Commission Cycle). Such contracts will list how the commission cycle runs and when the commission will be paid.
5. For agents contracted as License Only Agents (LOA), commissions are generated from the commission statements that are sent to us from each company.
6. All commissions paid to agents are linked to the respective agents' file in our database, so that the amounts paid will be saved in the agent file. These records/statements will, in good faith, be provided to the respective company in the event they request them.



7. In the event where policies written by an agent must be recovered and the agent's indebtedness to a company has been rolled up to Ark Consulting Group Inc., they will be turned over to our collection agency immediately and reported to Vector One, if applicable.

VII. MONITORING AND ENFORCEMENT

All employees and agents are responsible for enforcing this policy. Those who violate this policy are subject to discipline up to and including termination in accordance with Ark Consulting Group Inc. Corrective and Disciplinary Action Policy.



Policy Name: Training and Education
Version Number: 1.0
Last Revised: 1-11-2020

Training and Education

I. POLICY APPLICABILITY

Stakeholders	Products	Functional Owners
Ark Consulting Group Inc. Employees/Staff Agents	<ol style="list-style-type: none">1. All companies with federally regulated products and Prescription Drug Plans (PDP) including all Medicare Advantage, Special Needs Plans, and Prescription Drug Plans2. All Health and Accident companies with state regulated products including all Medicare Supplement Insurance Plans, Long Term Care, Disability Plans, and Critical Illness Plans3. All Life Insurance companies with state regulated Life Insurance Plans, Annuities, Single Pay, Final Expense and Burial.	Vince A Lanni

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III. POLICY PURPOSE (Scope)

This policy governs training and education related issues for Ark Consulting Group Inc. All personnel of Ark Consulting Group Inc. must comply with this policy. Demonstrated competence in the requirements of this policy is an important part of the responsibility of all members of the workforce under Ark Consulting Group Inc. hierarchy.



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V. GENERAL COMPLIANCE TRAINING

1. It is the policy of Ark Consulting Group Inc. to provide or make available clear and complete general compliance training to all staff and down-line agents within the first 90 days of initial hire and annually thereafter; whether it comes directly from Ark Consulting Group Inc. itself or is provided by a carrier through product training, certification, AHIP training or the like. Ark Consulting Group Inc. Compliance training for its non-agent staff shall encompass general compliance rules found in the 5 AHIP modules released each year, containing regulations and policies that govern our day-to-day business operations. This training containing the modules including a General Compliance course, a Privacy/Security (HIPAA) course, a Fraud, Waste and Abuse course, and a Basic Medicare Training course. The Compliance Training as a whole will be administered in a computer-based format; it will be sent to all applicable employees, and they will be required to read through the 5 module and answer all questions correctly in order for the training to be complete.
 - A. The General Compliance portion of Ark Consulting Group Inc. Compliance Training will give an overview of Ark Consulting Group Inc. Compliance Program as a whole. It will discuss what a Compliance Program is, why Ark Consulting Group Inc. is required to maintain one, what the program is supposed to accomplish, and how it pertains to our everyday business.
 - B. Fraud, Waste and Abuse training will also be included or made available in accordance with the General Compliance Training. Ark Consulting Group Inc. will provide this training to all non-agent staff with-in 90 days of initial hire and annually thereafter. Each carrier is responsible for providing this training to their respective agents to meet their individual demands.



- C. HIPAA training, at minimum, shall include the basics of HIPAA itself; the basics of HIPAA's privacy and security requirements and restrictions; and a review of relevant and appropriate internal Policies and Procedures related to HIPAA and HIPAA compliance.
- D. As part of the Ark Consulting Group Inc. General Compliance training, employees are now required to complete a basic Medicare training program through AHIP. This training will give a in depth understanding of the Medicare Program. It is included in Ark Consulting Group Inc. New Hire and Annual Compliance Training Programs.

2. All agents that are planning to market and sell federally regulated products and Prescription Drug Plans (PDP) including all Medicare Advantage, Special Needs Plans, and Prescription Drug Plans are required to certify for each product as provided by the individual company or carrier. Ark Consulting Group Inc. relies solely on the company's direction and protocol for the product certifications Ark Consulting Group Inc. relies on its carriers to provide or make available proper training and/or training materials deemed necessary for Ark Consulting Group Inc. staff and agents to accurately and successfully market the products of each carrier.

2.1 Ark Consulting Group Inc. policy is to refrain from sending any supplies or marketing materials to an agent until notification from the company stating that an agent is certified and actively appointed with the company (Ready to Sell)

VI. MONITORING AND INFORCEMENT

All staff and agents are responsible for enforcing this policy. Those who violate this policy are subject to discipline up to and including termination in accordance with Ark Consulting Group Inc. Corrective and Disciplinary Action Policy.



Policy Name: Corrective and Disciplinary Action
Version Number: 1.0
Last Revised: 1-11-2020

Corrective and Disciplinary Action

I. POLICY APPLICABILITY

Stakeholders	Products	Functional Owners
Ark Consulting Group Inc. Employees/Staff Agents	<ol style="list-style-type: none">1. All companies with federally regulated products and Prescription Drug Plans (PDP) including all Medicare Advantage, Special Needs Plans, and Prescription Drug Plans2. All Health and Accident companies with state regulated products including all Medicare Supplement Insurance Plans, Long Term Care, Disability Plans, and Critical Illness Plans3. All Life Insurance companies with state regulated Life Insurance Plans, Annuities, Single Pay, Final Expense and Burial.	Vince A Lanni Legal counsel

II. POLICY STATEMENT

Ark Consulting Group Inc. is committed to achieving and maintaining world-class levels of corporate governance and ethical business conduct. Our goal is to advance a company culture that fosters a real dedication to care and serve, to innovate and grow, and to meet our high standards of business practice and performance.

III. POLICY PURPOSE (Scope)

This policy will establish fair and appropriate procedures covering corrective or disciplinary action for all employees and agents in Ark Consulting Group Inc. hierarchy.

IV. POLICY DEFINITIONS

All of Ark Consulting Group Inc. administrative staff and marketing teams shall herein be referred to as: “Staff” or “Employee” OR Sub-Contractors Ark Consulting Group Inc. shall be referred to as: “Ark Consulting Group Inc.”



All external agents/ staff/ manager's/business entities contracted under Ark Consulting Group Inc. are referred to as: "Agent(s)" All companies represented by Ark Consulting Group Inc. is referred to as "Company or Carrier" Centers for Medicare and Medicaid Services shall be referred to as: CMS Health Insurance Portability and Accountability Act of 1996 shall be referred to as: "HIPAA" Health Information Technology for Economic and Clinical Health Act of 2009 shall be referred to as "HITECH"

V. POLICY PROVISIONS

1. It is the Policy of Ark Consulting Group Inc. to establish and implement appropriate, fair, and consistent disciplinary actions for workforce members who fail to follow established policies and procedures, or who commit various offenses.
2. Certain offenses can invoke immediate termination, including, but not limited to:
 - Theft
 - Intentional lying or deception
 - Drug or alcohol use while on the job
 - Violence against persons or property
 - Breach of confidentiality
 - Insubordination or other refusal to perform
 - Using vulgar, profane, or obscene language
 - Possessing or using weapons on company property
 - Being convicted of a crime that indicates unfitness for a job or presents a threat to Ark Consulting Group Inc. or its employees in any way
 - 2.1 Offenses involving obvious illegal activity may result in notifications to appropriate law enforcement authorities.
 - 2.2 Offenses of a lesser degree may result in a written warning.
 - 2.3 More than three written warnings result in termination
3. Ark Consulting Group Inc. relies entirely on the resources of our carriers to provide us with reports which monitor agent activity. The reports are derived from verification calls made by the carrier to the customers. The reports indicate any negative responses from customers and reveal potential sales issues. The reports are viewed by the Compliance Officer and referred to the appropriate marketing team who in turn works with the agent to resolve the matter. If further action is needed or the issue is especially egregious, the matter will be escalated to Ark Consulting Group Inc. Compliance Director to decide on further action.



3.1 Each marketing team will receive a copy of the agents directly under his/her chain of command to contact regarding the report results. Marketing teams will work with the agent via phone, email or in person to respond to the carriers with answers to all allegations.

4. Through company reports, Ark Consulting Group Inc. will monitor the number of infractions and/or violations per agent for those under our hierarchy.

4.1 The first infraction will be a phone call or email

4.2 The second infraction will be a phone call or email

4.3 The third infraction will be reviewed with the compliance office and one functional owner to determine the severity of the infraction. If necessary, the owner may recommend termination of the agent.

VI. MONITORING AND ENFORCEMENT

All employees and agents are responsible for enforcing this policy. Those who violate this policy are subject to discipline up to and including termination in accordance with Ark Consulting Group Inc. Corrective and Disciplinary Action Policy.



EQUAL OPPORTUNITY

As part of our customer service standards, it is an expectation for all employees to demonstrate an awareness of the value of diversity in our communities and our workforce. To help us do this, Ark Consulting Group Inc has established an Equal Opportunity and Affirmative Action Plan. The goal of a Civil Rights Compliance Plan is to have the number of women, minorities, and disabled people in our patient population and our workforce reflect the diversity of the communities that we serve. The Plan includes procedures for assessing the number of women, minorities, and disabled people, which comprise our patients, our workforce, and our communities. This assessment has demonstrated that these groups are well represented in our patient population. Women are very well represented in our workforce, minorities and disabled people are well represented. The Affirmative Action Plan has established goals to help our workforce become more representative of the diversity that we find in our communities. Equal Opportunity is not just a customer service goal of Ark Consulting Group Inc; it is a requirement to comply with state and federal laws and to meet the requirements of service contracts which Ark Consulting Group Inc maintains. Title VI of the Civil Rights Act of 1964 states that “no person shall on the grounds of race, color, or national origin be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” Over time 23 other federal laws, many state laws, and court decisions have extended this protection against discrimination to additional groups of people such as women and people over the age of 40. More recently, protections offered to people of different national origins have heightened concern about removing eligibility barriers for people who have little or no understanding of English. These groups are known as Limited English Proficiency Groups [LEPs]. New requirements now exist to ensure meaningful access to healthcare services for LEP persons. If you should encounter a patient/prospect or family member who does not understand English well, refer to the Patients/Prospects with Language Barriers Policy and contact a Supervisor. Ark Consulting Group Inc is obligated to provide free oral interpretation for any patient who has limitations in speaking and understanding English or is hearing impaired. Ark Consulting Group Inc maintains a written complaint procedure regarding equal opportunity and civil rights compliance. Notices regarding its availability are posted for both the public and Ark Consulting Group Inc employees. The Affirmative Action Plan and Civil Rights Compliance Plan are available for review. The Compliance Officer has been appointed as Ark Consulting Group Inc’s Equal Opportunity Officer and as the Limited English Proficiency Officer. Ark Consulting Group Inc is also committed to providing ongoing training for employees to increase understanding and awareness of different cultures and civil rights issues. Our goal is to remove as many obstacles of this kind as possible for community members who may need our services or who may want to work at Ark Consulting Group Inc.



Signature Page

I have received and read the 2022-2023 Ark Consulting Group Inc Corporate Compliance Handbook. I understand the contents of the information contained in this booklet and understand that if I have questions that I may contact Ark Consulting Group Inc's Compliance Officer or Administration for any questions I might have:

Ark Consulting Group Inc Compliance Officer Phone Number: 888.884.1224 x 103

Printed Name

Signature

Title

Date