



Start Hearing Provider Manual

January, 2024

Start Hearing Provider Manual



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Start Hearing Provider Manual



Welcome

Welcome to Start Hearing, formerly known as American Hearing Benefits, Inc. (AHB). Thank you for participating in our network of Audiologists, Hearing Instrument Specialists, and other hearing professionals.

Start Hearing is a third-party network, offering hearing health solutions to our partners in managed care organizations, affinity groups, unions, employers, and in the workers compensation space.

How to use this Provider Manual

Start Hearing is committed to assisting its Provider community by supporting their efforts to deliver well-coordinated and appropriate hearing health care to our customers. Start Hearing is also committed to disseminating comprehensive and timely information to its Providers through this Provider Manual ("Manual") regarding Start Hearing operations, policies, and procedures. Updates to this Manual will be posted on our website at www.starthearing.com/downloads.

Additionally, Providers may be notified via newsletter of any changes to all manuals from Start Hearing. Providers may contact our Caring Center at **1-888-819-9345** to request an updated copy of this Manual to be mailed to you. In accordance with the Network Provider Agreement, Providers are required to comply with provisions of this Manual. Start Hearing routinely monitors compliance with the various requirements in this Manual and may initiate corrective action, including denial or reduction in payment, suspension, or termination, if there is a failure to comply with any requirements within this Manual.

About Start Hearing

Start Hearing is a division of Starkey, one of the world's leading providers of hearing healthcare.

Founded in 1967, Starkey is the only hearing aid manufacturer among the remaining Big 5 that is privately held and the only manufacturer that is American owned. It employs more than 5,000 people and consistently delivers the industry's most innovative and reliable hearing care solutions.

Starkey has advanced technology in hearing aids to more than just improving hearing. The addition of artificial intelligence and health monitoring technology are just the beginning. In fact, in 2022 the Starkey Evolv AI product was a Hearing Technology Innovator Award Winner. www.starkey.com/press/awards

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Start Hearing was acquired by Starkey in 2005. Start Hearing has a long history of contracting with a variety of partners, such as managed care organizations, affinity groups, unions, employers, and in the workers compensation space to provide hearing health services.

For anyone seeking to improve, protect or enhance their hearing, Start Hearing is a pioneering partner that can help people of all backgrounds begin to experience sound in richer, healthier ways.

Start Hearing Mission Statement

WE BELIEVE

the reward of healthy hearing is an enhanced life.

WE EXIST TO

create conditions for everyone to start hearing better.

HOW WE DO IT

Personal devotion

Obsessively focus on people (not systems or processes) and how to help them thrive.

Power of belonging

Build supportive and diverse communities around healthy hearing as a positive pursuit.

Tech for good

Act with optimism and a visible commitment to improving the world through wellness tech.

Purposeful partnership

Be an extraordinary partner to organizations that can help expand access to modern hearing solutions.

Hold the door open

Lead with transparency and respect for each customer, so that we're ready to welcome all kinds of customers.

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Contact Information

The following table includes several important telephone and email addresses available to Providers and their office staff.

START HEARING CONTACT INFORMATION

Website www.starthearing.com

Address Start Hearing, Inc.
6700 Washington Ave S
Eden Prairie, MN 55344-3405

Fax 952-995-8884

DEPARTMENT	PHONE	EMAIL
Billing and Claims	1-800-769-0913	claims@starthearing.com
Credentialing Department	1-800-510-4194	credentialing@starthearing.com
Discount Customer Service	1-888-901-8141	support@starthearing.com
Workers Comp Customer Service	1-800-733-2588	wc@starthearing.com
Provider Line – General Inquires & Process Questions	1-888-819-9345	request@starthearing.com
Orders		ordering-glencoe@starthearing.com
Process Guides and Forms		starthearing.com/downloads

As a reminder, when contacting Start Hearing please have your practice name and Tax ID number available.

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Provider Code of Conduct

The Provider Code of Conduct applies to all actions taken by Providers, and their Owners and employees, while participating in the Start Hearing network. It is important to Start Hearing that its partners are committed to delivering the reward of healthy hearing to customers of the Start Hearing network with integrity and care, consistent with the code of conduct.

Bribery and Corruption

Start Hearing does not tolerate corruption. We are committed to adhering to a high standard of ethical conduct and acting with integrity and honesty wherever we do business. Start Hearing Providers are strictly prohibited from offering or paying bribes or kickbacks to influence decision-making or obtain an improper business advantage.

Data Protection and Privacy

Start Hearing is committed to protecting confidential, nonpublic information, including personally identifiable health information. We require that our partners also protect this information.

To that end, Providers must keep such information confidential; use it only for the purposes for which the Provider received the information; and disclose it to third parties only when necessary and appropriate and only when permitted under the law. Furthermore, Providers must ensure that confidential information is protected and stored in a safe location, whatever its format.

Respect for Others / Non-Discrimination

We all deserve to work in an environment where we are treated with dignity and respect. Start Hearing is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. Our Providers must commit to maintain a workplace free of intimidating or offensive behavior, harassment, and discrimination based on race, color, national origin, religion, gender, sexual orientation, political affiliation, disability, or any other characteristic protected by law.

Accuracy of Financial Records

It is important for Providers to maintain accurate financial records of their business. For that reason, false, misleading, incomplete, inaccurate, or artificial entries in books and records related to the Start Hearing network are strictly prohibited.

Start Hearing Provider Manual



Conflicts of Interest

Personal interests must never compromise the interests of Start Hearing or its Providers or other partners. Providers must avoid any conflicts of interest that might impair, or even appear to impair, their ability to make objective and fair decisions when participating in the Start Hearing network.

Intellectual Property

Integral to Start Hearing's business success is protection of its intellectual property and confidential company information. Providers must not use Start Hearing's intellectual property, including brand names, patents, copyrights, and trade secrets, unless authorized to do so by Start Hearing, and must use care to protect such intellectual property when Providers have been authorized to use it.

Provider Roles and Responsibilities

Start Hearing Provider Policies

Providers must comply with the terms of this Manual, including the Start Hearing Provider Policies that are attached as Exhibits:

- Fraud, Waste and Abuse Policy – Exhibit A
- Anti-Corruption Policy – Exhibit B
- Compliance Monitoring Policy – Exhibit C
- Conflict of Interest Policy – Exhibit D
- Provider Compliance Education and Training – Exhibit E
- Reporting, Non-Retaliation and Investigations Policy – Exhibit F

Confidentiality

Start Hearing requires that its Providers protect the privacy and security of the records and information of Start Hearing and its customers, employees, and other partners.

Providers are responsible for implementing the technical, administrative, and physical safeguards to ensure the confidentiality, integrity, and availability of Protected Health Information ("PHI") as regulated under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA").

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Use of Business Associate Agreements

Business Associate Agreements set forth the terms and conditions pursuant to which Protected Health Information that is created, received, maintained, or transmitted by Start Hearing when it is acting as a Business Associate from or on behalf of Covered Entity ("PHI"), will be handled between the Business Associate and Covered Entity. Providers must commit to comply with the Privacy Standards for Individually Identifiable Health Information (the "Privacy Rule") and the Security Standards for electronic Protected Health Information (the "Security Rule") under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and implementing regulations (the "HIPAA Rules"), as each is amended from time to time.

Business Associate Agreements are appended to the Provider Credentialing Packet provided by Start Hearing.

Complaints & Grievances

Provider Complaints

A Provider wishing to lodge a complaint may contact the Start Hearing Credentialing Department by phone or email. Upon receiving a complaint, Start Hearing will contact the Provider to obtain more information and identify timelines and objectives for resolving the Provider's issue. Throughout the course of its response to complaints, Start Hearing will collaborate with the Provider to develop and implement a strategy for resolving issues.

Customer Complaint Resolution

When Start Hearing receives a complaint regarding one of its Providers from a customer, the matter will be brought to the Provider to identify the possible reasons for the complaint and actions that should be taken to achieve a positive resolution. During the course of an investigation, the Provider shall not take any action (or omit to take any action) that is retaliatory in nature against the customer. If appropriate, Start Hearing will reassign the customer to another Start Hearing Provider.

Depending on the nature of the complaint and Provider history, Start Hearing may take immediate action to resolve the complaint, initiate a remedial action plan to prevent repeat occurrences, and/or initiate a review by the Start Hearing Steering Committee. During this process, Start Hearing will review any actions or action plans and monitor through completion.

Start Hearing Provider Manual



Remedial Actions

Start Hearing may take corrective action with respect to a Provider for any noncompliance with the terms of this Manual, the Network Provider Agreement or other agreements between Start Hearing and the Provider, or any of Start Hearing's Processes & Procedures, Agreements and Manuals.

Forms of Remedial Action

Corrective actions taken by Start Hearing may include the following process:

- Written Warning: Start Hearing may provide a notification of the violation to the Provider.
- Action Plan: Start Hearing may apply an action plan to create a process to prevent repeat occurrences.
- Probation: A Provider may be placed on probation for a period of up to one (1) year unless such period is extended at the discretion of the Steering Committee. Probation may be imposed depending on the severity of a violation, Provider history of violations, or noncompliance with an action plan. During probation, any further violations may result in immediate termination.
- Termination: Start Hearing may terminate a Provider's relationship with the network with or without a written warning, with immediate effect, and with or without an opportunity to cure violations. Termination may be appropriate due to the severity of the violation, Provider history of violations, failure to comply with an action plan or other instruction received from Start Hearing, failure to respond or to provide accurate information in response to requests from or in communications with Start Hearing to inquiries, or violation of probation.

Credentialing

The credentialing process exists to verify that participating Owners and Providers meet the criteria established by Start Hearing, as well as applicable government regulations and standard of accrediting agencies.

Start Hearing will conduct Owner and Provider initial credentialing to become part of the network, as well as a re-credentialing at least every 36 months from the date of the initial credentialing decision and/or most recent re-credentialing decision.

Start Hearing Provider Manual



Start Hearing reviews monthly reports released by National Practitioner Databank (NPDB), State Exclusion Lists, Medicare Opt-Out, General Service Administration (GSA)/SAMs, the Office of Inspector General (OIG) and Social Security Administration/SSDM to identify any network Providers who are newly deceased, have been sanctioned or have been excluded from participating in Medicare or Medicaid.

Notice: In order to maintain a current Provider profile, Providers are required to notify Start Hearing of any relevant changes to their credentialing information in a timely manner but in no event later than 10 days from the date of the change.

Provider Credentialing Documents

Start Hearing utilizes a Standardized Credentialing Application. Whether the Provider completes the application or has registered their credentialing information on the Council for Affordable Quality Health (CAQH) website, the following information must be on file:

Create CAQH Profile – <https://proview.caqh.org>

- CAQH Application
- Attestation (must be completed every 120 days)
- Professional License
- Education
- Work History
- Disclosure Questionnaire
- Certificate of Insurance (Professional Liability)
- Medicare and Medicaid Provider ID Numbers (if applicable)

Providers must complete all the required information above on the CAQH website. CAQH will complete the verification process and sanctions checks, which will then be provided to Start Hearing. CAQH can take up to 14 business days to process an application. Once Start Hearing has been notified of approved application, please allow five business days to receive your welcome letter indicating Credentialing completion to join the Start Hearing network.

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Owner Credentialing Documents

1. Owner Application and Attestation (signed by Owner)
2. Facility application for each dispensing location*
3. Professional application for each Provider*
4. Network Provider Agreement
5. Certificate of Professional (Malpractice) Liability Insurance
 - a. Required Minimum Coverage Limits – \$1 million per occurrence/\$3 million aggregate
 - b. All Professionals must be covered
 - c. Start Hearing to be named as certificate holder
6. Business License (if applicable)
 - a. Includes any city, county or state business licenses required by the city, county, or state, where the business is located, to do business
7. Current W-9
8. Direct Deposit Form (if applicable)

*We will accept a roster with all required fields of the application vs. filling out an application for each servicing location and/or Provider.

Credentialing Committee

The Credentialing Committee has the responsibility to establish and adopt necessary criteria for participation, termination, and direction of the credentialing procedures, including participation, denial, and termination. Committee meetings are held at least quarterly and more often, as deemed necessary.

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Provider Right to Review and Correct Information

All Providers participating within the network have the right to review information obtained by Start Hearing to evaluate their credentialing and/or re-credentialing application. This includes information obtained from any outside primary source such as CAQH, malpractice insurance carriers and state licensing agencies. This does not allow a Provider to review references, personal recommendations, or other information that is peer-review protected. Providers have the right to correct any erroneous information submitted by another party (other than references, personal recommendations, or other information that is peer-review protected) in the event the Provider believes any of the information used in the credentialing or re-credentialing process to be erroneous, or should any information gathered as part of the primary source verification process differ from that submitted by the Provider. To request release of such information, a written request must be submitted to the Credentialing Department. Upon receipt of this information, the Provider will have thirty (30) days from the initial notification to provide a written explanation detailing the error or the difference in information to the Credentialing Committee. The Credentialing Committee will then include this information as part of the credentialing or re-credentialing process.

Provider Right to Be Informed of Application Status

All Providers who have applied to join the network have the right to be informed of the status of their application upon request. To obtain application status, the Owner/Provider should contact the Credentialing Department at **1-800-510-4194**.

Provider Right to Appeal Adverse Re-credentialing Determinations

Applicants who are existing Owners/Providers and who are declined continued participation due to adverse re-credentialing determinations (for reasons such as appropriateness of care or liability claims issues) have the right to appeal the decision. All written requests should include additional supporting documentation in favor of the applicant's reconsideration for participation in the network.

Appeals

A decision of the Start Hearing Credentialing Committee may be appealed by a Provider if the Provider is able to present new or additional information to the Committee that had not been submitted to the Committee at the time of its initial decision and the Provider is not otherwise ineligible for appeal. In particular, Providers are not eligible for appeal if an application or participation status had been administratively denied or terminated due to a failure to satisfy credentialing criteria.

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Any appeal must be submitted to Start Hearing's Credentialing Department within 30 days from the date of the Credentialing Committee's determination notice. The appeal must state the new or additional information upon which the appeal is based and indicate whether the Provider requests a live hearing (which may be conducted in person, by conference call, video conference, or other form of remote communication).

If an appeal is accepted by the Credentialing Department, the Provider will receive a notification specifying the date, time, and location (or method of remote participation) of the hearing, if applicable. When practicable, appeal hearings will be conducted within 30 days of the Credentialing Department's receipt of the appeal request. Any appeal determination is final and shall be binding on the Provider.

Provider Rights

Providers applying for participation or continued participation in the Start Hearing network have the following rights:

1. To review information obtained from outside sources to support their credentialing or re-credentialing application. The Provider does not have the right to review peer-review protected information, references, or recommendations.
2. To correct errors and/or discrepancies in the information that was submitted by the Provider that vary substantially from the information the Start Hearing verified through primary sources during the credentialing or re-credentialing process. Start Hearing's Credentialing department will notify the credentialing contact and the applying Provider that there is a discrepancy and provide the opportunity to correct any erroneous information. Corrections must be submitted within 15 days from the receipt of the notification.
3. To be informed, upon request, of the status of their credentialing and/or re-credentialing application. Providers or the identified credentialing contact may contact Start Hearing's Credentialing department via email at credentialing@starthearing.com or by phone at **1-800-510-4194** to request status information.

Advertising Guidelines

Please note that before you use a third party's trademark or copyright in your advertising, you may need to obtain that party's prior consent or permission. Start Hearing and its participating Providers do not have a license to use third party trademarks (including Blue Cross, Blue Shield, and Federal Employee Program word marks and logos). Start Hearing prohibits the unauthorized use of any third party's trademarks, including registered BCBS Marks, in your advertising unless you have obtained written approval authorizing the use.

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Any advertisement containing a Start Hearing customer's plan name or that uses the Start Hearing trade name or trademark (logo) must be submitted to Start Hearing for review and approval prior to publication. As a condition to participation in the Start Hearing Network, a Provider agrees to not send marketing materials to or solicit customers that have been referred to the Provider through the Start Hearing network.

Advertising materials are promotional content in any form or medium, whether in electronic or paper format, including but not limited to:

- Direct mail
- Email
- All Printed or electronic advertising
- Social media or other online advertising

The Start Hearing Steering Committee will review and respond to requests for approval of advertising materials, if possible, within thirty (30) business days.

Please contact Start Hearing Marketing department at info@starthearing.com if you have any questions regarding our marketing guidelines.

Credentialing Rosters

Start Hearing provides a secure location and Provider roster to required payers based off their requested frequency and format to ensure they have the most accurate and up-to-date location and Provider information. Depending on the payer requirement the rosters consist of information that is obtained by Start Hearing via the application and/or provider's CAQH profile.

Start Hearing Program Overview

Referrals

Patients are referred to Start Hearing by Insurance plans, Unions, Employers and other associations. Once they contact the Start Hearing Caring Center to schedule a hearing test appointment, our Hearing Care Advisors will locate the nearest credentialed Provider and discuss the patient's current hearing condition and lifestyle to gain insight into the patient's needs.

The Hearing Care Advisor will contact the selected Provider's office to schedule the patient's appointment. Next, the Hearing Care Advisor will warm transfer the patient to the Provider office. Start Hearing will send a confirmation email containing appointment and patient information to Provider's office.

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Plan Types

Start Hearing will have a variety of partnerships to meet the needs of the plan type who may or may not provide a covered benefit towards to the purchase of a hearing aid(s) for a patient. As the agreement and partnership are between Start Hearing and the plan, the patient will be identified as one of the plan types below once the patient is registered through Start Hearing program.

Insurance

- Referrals may be specific to a credentialed Audiologist and may not allow Hearing Aid Dispensers or Hearing Instrument Specialists. Please reference the Start Hearing contracted process guide for specific plan information.
- Referrals from partnerships that may provide a benefit towards hearing aid(s).
- The patient may be responsible to pay a portion based on the benefit covered by their plan.
- Pricing for hearing aid(s), products, services, and accessories vary based on contracted plan.

Workers Comp

- Referrals from partnerships to service and provide hearing aid products to a Worker's Compensation claimant.
- Workers Compensation claimants typically have no out-of-pocket costs. Start Hearing would administer the claim and advise all parties if there are any potential out-of-pocket costs.
- Pricing for hearing aid(s), products, services, and accessories vary based on contracted plan.

Discount

- Referrals from partnerships that do not provide a covered hearing aid(s) benefit.
- Patient is responsible to pay 100% of the plan's contracted rate at the time of service and/or fitting.
- Pricing for hearing aid(s), products, services, and accessories vary based on contracted plan.

Start Hearing Provider Manual



Program Benefit Package

- Reference the contracted process guide for specific plan details.
- Up to a three-year manufacturer's warranty on all hearing aid models.
- 60-day risk free trial period (Providers may not charge for restocking fees).
- Free office visits for the first year (limit of six visits).
- Up to a five-year supply of free batteries for each non-rechargeable hearing aid, batteries vary by contracted plan.
- Standard receivers and earmolds are free with initial hearing aid purchase.

General Referral Process

1. Patient will call the Start Hearing Caring Center and speak with a Hearing Care Advisor (HCA). The HCA will locate the nearest Provider location based on patient's zip code.
2. HCA will discuss with patient what their hearing health needs are and warm transfer the patient to the Provider's office to schedule an appointment with a Start Hearing credentialed Provider.
 - a. HCA will obtain patient's insurance information and contact the plan for verification of benefits, when applicable.
3. Start Hearing will send a confirmation email containing appointment date/time, contracted process guide and patient information to Provider's office.
4. Provider will perform testing and diagnostics in accordance with usual and customary office procedures.
5. Payment will be collected by the HCA either at the time of the order or at the time of the fitting.
 - a. All hearing aid(s) must be paid for in full before a patient can take possession.
 - b. Payment can be made with check payable to Start Hearing as well as by credit card, Wells Fargo financing, or Care Credit financing.
6. Provider will place hearing aid order with Start Hearing. Standard product orders can be emailed to ordering-glencoe@starthearing.com or by fax to **952-995-8884**.

Start Hearing Provider Manual



7. Provider will fit patient at the time of fitting. Patient and Provider will need to sign the Start Hearing Confirmation of Delivery form and send to Start Hearing by email to claims@starthearing.com or by fax to **952-995-8884**.
8. If payment was not collected at the time of order, an HCA will contact patient to collect final payment.
9. Start Hearing will issue fitting fee to Provider 60 days after the date of fitting.

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Insurance Process

Each contract may have their own procedures to follow. Please reference the contracted process guide for specific plan information.

All services may be required to be performed by a Start Hearing credentialed audiologist. The credentialed audiologist must perform the testing and fitting.

Process Overview

1. Patient will call the Start Hearing Caring Center and speak with a Hearing Care Advisor (HCA). The HCA will locate the nearest Provider location based on patient's zip code.
2. HCA will discuss with patient what their hearing health needs are and warm transfer the patient to the Provider's office to schedule an appointment with a Start Hearing credentialed Provider.
 - a. HCA will obtain patient's insurance information and contact the plan for verification of benefits.
3. Start Hearing will send a confirmation email containing appointment date/time, contracted process guide and patient information to Provider's office.
4. Provider will perform testing and diagnostics based on benefit verification and coverage.
5. Provider will send hearing aid order form and impressions (when necessary) to Start Hearing. Standard hearing aid orders can be emailed to ordering-glencoe@starhearing.com or entered in the Starkey eStore.
6. Reference the Start Hearing contracted process guide for specific plan information and required documents. Provider will send the required documentation to Start Hearing at ordering-glencoe@starhearing.com and we will process and ship the order.
7. Provider will fit patient at the time of fitting. Patient and Provider will need to sign the Start Hearing Confirmation of Delivery form and send to Start Hearing by email to claims@starhearing.com or by fax to **952-995-8884**.

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Workers Comp Process

Process Overview

1. The Workers Comp contract will send all claimant referrals directly to Start Hearing and will be referred to a credentialed Provider OR Providers can send Workers Comp claimant referrals directly to Start Hearing.
2. Provider will perform hearing test and send the hearing aid request to Start Hearing.
3. Reference the Start Hearing contracted process guide for specific plan information and required documents. Provider will send the required documentation to Start Hearing at WC@starhearing.com. All fields within the required documents must be completed or further information will be requested from Provider.
4. Workers Comp contract will verify claim status and approve or deny product recommendation and PO will be issued to Start Hearing, if approved.
5. Provider will send hearing aid order form and impressions (when necessary) to Start Hearing. Standard hearing aid orders can be emailed to: WC@starhearing.com.
6. Start Hearing will ship approved products to Provider.
7. Provider will fit the patient.
8. Provider will fit patient at the time of fitting. Patient and Provider will need to sign the Start Hearing Confirmation of Delivery form and send to Start Hearing by email to claims@starhearing.com or by fax to **952-995-8884**.

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Order Process Overview

Hearing Aid Brands

Products from the following brands have been approved for Start Hearing network use:

- Starkey
- Audibel

Earmolds

Earmolds ordered with the initial set of hearing aid(s) are free of charge to the patient. Any additional earmolds ordered after the trial period can be charged to the patient, please see contract process guide for further pricing and details. Associated charges may be billed to the patient upon disclosure of the fee.

Ordering & Account Numbers

When ordering hearing aid(s), accessories, or earmolds, please use the following account numbers by segment. If this is your first Start Hearing order, you will need to set up your commercial account number under Start Hearing's bill-to-account number:

PLAN TYPE	BILL-TO-ACCOUNT NUMBER
Discount Orders	E6009
Insurance and Workers Comp Orders	E6048

Your ship-to-account number will be the same as your commercial number. Please send orders to:

Starkey Attn: Start Hearing 6700 Washington Ave S Eden Prairie, MN 55344.

Standard product orders may be emailed to ordering-glencoe@starhearing.com or by fax to **952-995-8884**.

Fitting Appointment & Collecting

Once the hearing aid order is received, your office will need to contact the patient to arrange a fitting appointment. Our Hearing Care Advisor will contact your office to verify the appointment date and arrange final payment on the day the hearing aid(s) are fit.

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At the fitting appointment, the patient and Provider need to sign the Start Hearing Confirmation of Delivery form to confirm fitting of the product and acknowledging the terms and conditions. Once the form has been signed by the Provider and the Patient, please email to claims@starhearing.com or by fax to **952-995-8884**.

Provider Reimbursement

Start Hearing provides a fitting fee for each hearing aid that a patient is fit with. Start Hearing will remit payment to the location after the 60-day trial period.

Services, Batteries & Warranty

Office Visits

All adjustments and office visits that occur within the first year are at no charge to the patient (limit of six visits per year).

Repairs

Start Hearing patients receive up to a three-year warranty and a one-time loss and damage. Please refer to the Start Hearing contracted process guide for details. Repairs are processed under your Start Hearing commercial account number. For Workers Comp repairs, use the Start Hearing bill to account.

Remakes

Remakes for the same hearing aid and/or shell type will be covered under the new product warranty for one year. Please refer to the Start Hearing contracted process guide for details. After the first year, remakes are processed under your Start Hearing commercial account number.

Loss & Damage

Please refer to the Start Hearing contracted process guide for details. Loss and damage replacements will be processed under Start Hearing bill to account. Start Hearing will collect the deductible amount directly from the patient.

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Batteries

Included with each hearing aid, there will be one carton (40 cells) of batteries. Please give the carton to the patient. If applicable, Start Hearing will ship remaining free batteries annually directly to the patient's home.

Returns & Exchanges

Returns/Exchanges

Returns/Exchanges may only take place within the 60-day trial period. To initiate the return/exchange process, please fill out the return/exchange form found here www.starthearing.com/downloads and fax to Start Hearing at **952-995-8884**.

Please send returns/exchanges to:

Starkey Attn: Start Hearing
6700 Washington Ave. S
Eden Prairie, MN 55344.

Please include the return/exchange form with the original hearing aid(s). No fitting fees are paid on returned products.

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SoundGear

SoundGear Referral Program

- Leads and referrals are generated from Start Hearing's marketing efforts through the website or partnerships. Calls are generated via web forms or the customer calling the Caring Center to locate a Provider to purchase SoundGear products.
- Customer is responsible to pay Start Hearing for the entire cost at the time of purchase.
- After the 30-day trial period, Start Hearing will pay the Provider a fitting fee.

Sales & Transaction Process

The Hearing Care Advisor's role is to help support the sales and decision-making process and locate the closest SoundGear Provider in the area to make an appointment for impressions.

In addition, our Hearing Care Advisors will be able to provide the customer with pricing information and will process all related payments prior to appointment. Providers **do not** need to collect any form of payments.

Impression and Ordering Process Overview

1. Customer will call the SoundGear Caring Center and speak with a SoundGear Hearing Care Advisor.
2. SoundGear Hearing Care Advisor will schedule an appointment with a SoundGear network Provider.
 - a. Appointment confirmation email will be sent to the customer and Provider, which includes the following forms:
 - i. Completed Order Form
 - ii. Sales Agreement
 - iii. SoundGear Product Overview

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3. Customer will go to appointment and Provider will take impressions for the purchased custom product.
 - a. SoundGear will reimburse the Provider for impression and fitting after 30 days from date of fit.
 - b. SoundGear does not pay or reimburse for any additional costs incurred during visit. (Hearing Test, Impression material, etc.)
4. Customer and Provider will need to Sign the SoundGear Sales Agreement prior to leaving the impressions appointment. The completed and signed Sales Agreement will need to be faxed or emailed to ordering-glencoe@starthearing.com or by fax to **952-995-8884**.
5. Ship the order with the completed order form and impressions to:

Starkey: ATTN SoundGear
6700 Washington Ave S.
Eden Prairie, MN 55354

When sending custom orders, please DO NOT email paperwork. Please send paperwork with the impressions to avoid delay and order error.

SOUNDGEAR PRODUCTS

- | | |
|----------------|---|
| • Phantom ITE | • Mini Filter Ear Plugs |
| • Platinum ITE | • High Frequency Noise Filter Ear Plugs (Hocks) |
| • Silver ITE | • Solid Silicone Ear Plugs |

Product Shipment & Provider Reimbursement

Once the order is completed, SoundGear will ship the product directly to the customer's address. After the 30-day trial period, SoundGear will issue a dispensing fee to the Provider.

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Warranty, Accessories & Batteries

- SoundGear products are remade for fit issues only for the term of one year.
 - Remakes for the same ear and shell type will be covered under the one-year warranty.
 - Remakes will be processed on the SoundGear bill to account **E6009**.
- One-year, repair-only warranty processed on the SoundGear bill to account **E6009**.
- No Loss and Damage warranty.
- For additional batteries or accessories, please direct customer to www.soundgear.com

Returns & Exchanges

- Returns & Exchanges may only take place within the 30-day trial period. Please have the customer contact the SoundGear Hearing Care Advisor to initiate the process.
- SoundGear Hearing Care Advisors will process any exchanges, returns, and applicable refunds directly with the customer.
- Provider reimbursement is not paid on returned products. If Provider reimbursement is paid, this must be sent back to SoundGear within 30 days of customer returning the product.

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EXHIBIT A – Fraud, Waste, and Abuse

Start Hearing requires all participating Providers to comply with federal and state laws governing fraud, waste, and abuse (FWA).

All Providers, and employees of the Providers, must satisfy an initial training on fraud, waste and abuse, which must then be updated annually. The training requirement applies to all “covered entities”, as defined by the Center for Medicare Services (CMS), including employees of organizations that provide health care or administrative services for Medicare and/or Medicaid-eligible individuals under the Medicaid, Medicare Advantage or Medicare Part D programs. Providers and their employees must complete the training within 90 days of Provider’s initial contracting date, or date of hire. Each subsequent year, Providers and employees must complete the annual training no later than December 31.

Start Hearing or CMS may request copies of training certificates from time to time, but Providers maintain ultimate responsibility for completing the training and maintaining related records.

Each employee of a Provider who performs healthcare or administrative services for a Medicare-eligible individual under a Medicare Advantage program must complete the training. Please retain CMS training certificates for the mandatory record retention period of 10 years, together with the dates on which trainings were completed, training methods, materials and logs of the employees and Owners who participated. In the event the CMS training certificates are not available, Start Hearing may require that you complete an attestation confirming the FWA training has been satisfied.

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EXHIBIT B – Anti-Corruption Policy

Purpose

Start Hearing is committed to conducting its business with integrity and complying with all applicable laws. We will not tolerate bribery, corruption, or kickbacks by any agents, consultants, or credentialed Providers of Start Hearing.

The purpose of this Anti-Corruption Policy is to provide guidance to Providers in the Start Hearing network on complying with anti-bribery, anti-corruption, and anti-kickback laws, including, for example, the Foreign Corrupt Practices Act (“FCPA”) and the UK Bribery Act, in all countries in which Start Hearing operates.

Scope

The requirements of this policy apply to every Provider participating in the Start Hearing network, together with its employees or Owners (collectively “Covered Persons”).

Definitions

“Anything of Value” – Means anything that provides a tangible or intangible benefit to the recipient. This term should be interpreted broadly to include:

- money or payments or equivalents, such as gift certificates or stock;
- gifts or free goods;
- meals, entertainment, or hospitality;
- travel or payment of expenses;
- employment offers;
- personal use of company facilities;
- provision of services;
- purchase of property or services at inflated prices;
- assumption or forgiveness of indebtedness;
- enhanced social or business standing (e.g., making donations to government official’s preferred charity); and/or
- benefits to third persons related to Government Officials (e.g., close family members).

“Government Official” – Means any persons employed by federal, state, or local governments or acting on behalf of such governments, including:

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- any officer or employee of a government or any department, agency, or instrumentality of a government;
- any person acting in an official capacity on behalf of a government or any department, agency, or instrumentality of a government;
- any officer or employee of a company or business owned in whole or in part by a government, including healthcare professionals employed by government-owned hospitals or clinics or other health care facilities;
- any officer or employee of a public international organization such as the United Nations or World Health Organization;
- any officer or employee of a political party or any person acting in an official capacity on behalf of a political party; or
- any candidate for political office.

“Start Hearing” – Means Start Hearing, Inc. and all of its affiliates.

“Third Party” – Means any consultant, agent, broker, or other individual or entity that is not part of the Covered Person or Start Hearing.

General Prohibitions and Obligations

Prohibited Payments

Providers will not give, promise, offer, or authorize the giving of Anything of Value to Government Officials, customers, or other business partners in order to obtain or retain business by securing an improper business advantage, influencing a Government Official to misuse the Governmental Official’s position, or inducing an individual to breach a professional or fiduciary duty.

This prohibition extends to facilitation payments – small payments to Government Officials to secure or expedite the performance of a routine action to which the payer of the facilitation payments is entitled.

In the United States, laws also prohibit Covered Persons from offering, paying, soliciting, or receiving Anything of Value in exchange for referring an individual for an item, service, or facility paid for by a government healthcare program.

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Solicitation and Extortion

If a Government Official, customer, or other business partner solicits or attempts to extort gifts, cash, favors, or Anything of Value from a Covered Person in connection with participation in the Start Hearing network, the Covered Person must refuse the solicitation or demand.

Likewise, no Covered Person may ever demand personal benefits from Government Officials, customers, or any other person while participating in the Start Hearing network.

Accurate Record Keeping and Internal Accounting Controls

Providers will maintain a system of internal accounting controls designed to detect any violations of this policy and ensure that all books, records, and accounts related to participation in the Start Hearing network are kept in reasonable detail to reflect transactions accurately and fairly.

Specific Anti-Corruption Guidance

Third Parties

Relationships with Third Parties can present significant risks. Therefore, it is important for Providers to know their business partners and ensure they meet compliance standards.

Providers will not provide Anything of Value to a Third Party in connection with participation in the Start Hearing network if there is reason to know or suspect that some or all of the payment or thing will be passed on to a Government Official, customer, or other business partner in order to obtain or retain business by securing an improper business advantage, influencing a Government Official to misuse his or her position, or inducing an individual to breach a professional or fiduciary duty.

Providers should perform reasonable due diligence before engaging any Third Party, commensurate with the potential risk of the proposed Third-Party relationship. The due diligence should assess the basis for selecting the Third Party, including cost, qualifications, reputation, the legitimate need for the services to be rendered, and any relevant risk factors. Due diligence should be renewed periodically.

All contracts with Third Parties should contain representations and warranties to the effect that the Third Party will not engage in bribery, will notify Provider if any of its employees engages in bribery, and allows the Provider to unilaterally terminate the contract for any such violation.

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Gifts, Travel, Meals, and Hospitality

If Providers are providing gifts, travel, meals, or hospitality to Government Officials or to health care professionals, the following guidelines should be followed:

- The gifts, travel, meals, and hospitality must be legal and consistent with any applicable laws, rules, or regulations, including the Anti-Kickback Statute described below.
- The gifts, travel, meals, or hospitality must be for a bona fide business purpose and not to obtain or retain business by securing an improper business advantage, influencing a Government Official, or inducing an individual to breach a professional or fiduciary duty.

Political Contributions

Any Provider political contributions to Government Officials or to candidates for public office must comply with applicable laws, rules, and regulations.

Rebates, Discounts, and Incentives

Rebates, discounts, and incentives provided to customers or Third Parties can present potential corruption risks. Providers are responsible for ensuring that these payments are made in compliance with this Policy.

Anti-Kickback Statute

In the United States, the Anti-Kickback Statute ("AKS") may apply to interactions with private or government-employed healthcare professionals who are reimbursed by federal healthcare programs. Compliance with the AKS may require adherence to certain requirements for consulting agreements, product discounts, investment interests, or other arrangements with healthcare professionals.

Training

Anti-corruption training is required for all Covered Persons and must be provided to new employees during the onboarding process.

Seeking Advice and Reporting Alleged Violations

If you have any questions about this policy or compliance with the law, please contact the Start Hearing Credentialing Department.

Start Hearing will not tolerate retaliation of any kind against any Covered Person who reports, in good faith, any alleged violations of the applicable laws, rules and regulations, or policies and procedures.

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Provider Consequences and Legal Penalties

Violations of applicable anti-bribery and anti-corruption laws can result in severe civil and criminal penalties.

Failure to adhere to this policy may result in disciplinary action up to and including termination of participation in the Start Hearing network.

EXHIBIT C – Compliance Monitoring Policy

Purpose

Providers operate in a highly regulated environment with many complicated laws. As a result, it is critical that Providers participating in the Start Hearing network establish and maintain:

- an adequate and effective system of compliance controls to prevent unethical and illegal activity, including those related to the marketing, sale, and distribution of, and billing for, Start Hearing products and services;
- a measurement system for assessing the various risks of these activities; and
- appropriate methods for monitoring compliance with applicable laws, regulations, and compliance policies.

This compliance monitoring policy sets forth Start Hearing's policy for Providers participating in the Start Hearing network to conduct compliance monitoring relating to the functions described above.

Risk Assessment

Providers shall establish a method to assess major compliance and risk areas. The assessment shall consider:

- areas of concern identified by applicable regulatory bodies (e.g., by surveying CMS actions including audit actions, notices of non-compliance and warning letters, and areas routinely considered as potential risk areas);
- areas of concern identified by Providers; and
- areas of concern identified through interactions with patients, Start Hearing, or other business partners.

Based on a risk assessment, the Provider will determine if a corrective action plan is needed to address any discovered risks. Providers should implement procedures to ensure that risks are properly addressed.

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EXHIBIT D – Conflict of Interest Policy

Scope

This Conflict of Interest policy applies to Providers participating in the Start Hearing Network and their respective employees and Owners (collectively “Covered Persons”).

Definitions

“Conflict of Interest” – Means a situation in which financial, professional, or personal interests, including the interests of immediate family members, may compromise one’s professional judgment or professional or business obligations. Conflicts of Interest can be actual or potential conflicts of interest. The perception/appearance of a conflict is considered a conflict of interest for purposes of this policy. Most Conflicts of Interest can be cured with disclosure, consent, or modification. However, depending on the circumstances, it is prudent to simply avoid certain Conflicts of Interest.

“Vendor” – Means any individual or organization that currently or in the future conducts business or seeks to do business with a Provider.

“Start Hearing” – Means Start Hearing, Inc. and all its affiliates.

Guidance

It is impossible to list all specific situations that constitute a Conflict of Interest and there are no substitutes for honesty and the exercise of common sense and good judgment.

The following are examples of activities that often indicate or give rise to a Conflict of Interest:

- Transacting business on terms and conditions which are not arms-length dealing and/or which are significantly less advantageous than competitively available for goods or services of like grade and quality.
- Accepting personal loans from Vendors (other than banks or other lending institutions upon then prevailing terms and conditions).
- Accepting gifts, gratuities, or entertainment in cash or in kind (including free goods or Vendors’ services) from any present or potential Vendor which is not allowable under applicable law or other policies for Start Hearing Providers.

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Policy

All Covered Persons must avoid any actual or perceived Conflicts of Interest when participating in the Start Hearing network to ensure that the Conflict of Interest does not affect, or appear to affect, client safety or quality of care, research, or payment for services or interfere with the Covered Person's obligations and responsibilities. For example, any situation where a Covered Person may benefit financially, whether directly or indirectly (e.g., through a family member), as a result of that Covered Person's position with Start Hearing (except from normal compensation), is a potential Conflict of Interest and should be avoided.

Procedure

Addressing the Conflict of Interest

Following review and investigation, the Start Hearing Steering Committee shall decide whether a Conflict of Interest exists and determine an appropriate response to the Conflict of Interest. Violations of this policy subject the person involved to enforcement action as detailed in section E of this Policy. All Covered Persons have an obligation to cooperate in such investigations.

Procedures for Addressing the Conflict of Interest

After exercising due diligence, the Steering Committee shall determine whether the Conflict of Interest would be counter to the goals and values of the Start Hearing network, taking into account, among other relevant factors, whether customer safety or quality of care would be affected, and whether an alternative transaction could be identified as reasonable that would not give rise to a Conflict of Interest.

Violations of the Conflicts of Interest Policy

If the Steering Committee has reasonable cause to believe that a Provider has failed to disclose an actual or possible Conflict of Interest related to the Start Hearing network, it shall inform the customer of the basis for such belief and afford the customer an opportunity to explain the alleged failure to disclose.

If, after hearing the response of the customer and making such further investigation as may be warranted in the circumstances, the Steering Committee determines that the Provider has in fact failed to disclose an actual or possible Conflict of Interest, or violated this policy in any other way, it shall take appropriate disciplinary and/or corrective action, up to and including termination of participation in the Start Hearing network.

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Enforcement

Violations of this policy include, but are not limited to:

- a.** Failing to disclose potential Conflicts of Interest fully, accurately, or in a timely manner as described in this policy and/or initiating action on a disclosed matter prior to receiving the approval of Start Hearing.
- b.** Failing to report and/or failing to timely report known apparent violations of this policy.
- c.** Failing to cooperate in an investigation of any report of an apparent violation of this policy.
- d.** Making a false report of a violation.

In addition to the above penalties, Start Hearing may terminate the Provider's participation in the Start Hearing network, impose a corrective action plan, apply such other corrective actions as the Steering Committee deems appropriate, and/or pursue all legal and equitable remedies as may be appropriate.

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Exhibit E – Provider Compliance Education and Training Policy

Purpose and Scope

Start Hearing has the following policy to set forth the education and training parameters, schedule, and content of its Compliance Program for every Provider participating in the Start Hearing network and their respective Owners and employees (collectively “Covered Persons”).

Definitions

“Coding Staff” — Means a Covered Person, involved in preparing or submitting Medicare, Medicaid or other federal or state healthcare program or private insurance bills on behalf of Start Hearing.

“Provider” — Means a Covered Person participating as a healthcare Provider in the Start Hearing network.

“Program” — Means the information and education program maintained by Start Hearing and designed to ensure that each Covered Person is aware of all applicable healthcare laws, regulations and standards of business conduct including, but not limited to, Medicare and Medicaid laws, federal and state false claims laws and whistleblower protections, as they pertain to their job category. The Program will also educate the Covered Person of consequences to the individual and Company that will ensue from any acts of misconduct or violation of laws, regulations, or Start Hearing’s policies and procedures and of Start Hearing’s commitment not to Retaliate or Intimidate.

“Start Hearing” — Means Start Hearing, Inc. and all its affiliates.

Structure of Compliance Education and Training

Through the Program, Start Hearing is committed to providing ongoing education and training on the Start Hearing Code of Conduct, Compliance Program policies and procedures, employee guidelines, coding and billing standards, healthcare laws, and other federal and state statutes, regulations, and guidelines. This training and education may be provided by Start Hearing, or its provision may be contractually delegated to the Providers which employ the Covered Person.

Start Hearing tailors its training so that each Covered Person receives training and education that is appropriate to their job functions. The minimum education and training requirements are set forth below and summarized in the following chart:

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CATEGORY OF COVERED PERSON	CONTENT OF TRAINING	FREQUENCY OF TRAINING*
All Covered Persons	Compliance Program (to include Code of Conduct, policies and procedures, and employee guidelines), HIPAA, Medicare General Compliance, Fraud, Waste and Abuse training, Cultural Competency, and other compliance training as decided from time to time. Receipt and attestation are required.	Within 90 days of hire or network participation and annually thereafter

*Training in one category does not excuse the recipient from training in another category.

Training Program

The training to be delivered to each Covered Person is set forth in the above chart. Except as set forth specifically herein, the content, frequency and duration of the training will be determined by the Start Compliance Officer, from time to time with due regard to operational needs, legal and contractual requirements.

In addition to training, each Covered Person shall annually receive the Start Hearing Code of Conduct and other core Compliance Program policies that are determined advisable by the Compliance Officer and must confirm receipt and acknowledge understanding and awareness of each document, as appropriate.

Attendance & Participation

Attendance or participation in training courses and conformance with any other requirements of this Policy must be tracked and documented by the Provider, including attendance and participation for each Covered Person employed by the Provider. Providers shall, upon request of the Start Hearing Compliance Officer or Credentialing Department, provide an attestation of completion of such attendance and participation.

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EXHIBIT F – Reporting, Non-Retaliation, and Investigations Policy

Purpose

Start Hearing, Inc. sets forth the following plan for reporting and investigating suspected occurrences of Non-Compliance, which is applicable to all Covered Persons, as that term is defined below. It is the policy of Start Hearing that Covered Persons are responsible for knowing and adhering to the values and standards set forth in the Start Hearing Code of Conduct, policies and procedures, and all applicable laws and regulations wherever Start Hearing does business. Start Hearing will train and educate its Covered Persons as necessary to comply with the elements outlined above and will work cooperatively with Covered Persons when problems are identified to resolve those problems as quickly as possible.

The Start Hearing Compliance Officer investigates all incidents of suspected Non-Compliance.

Scope

The requirements of this policy apply to every Provider participating in the Start Hearing network (collectively “Covered Persons”).

Definitions

“Non-Compliance” – Means failure to act in accordance with the Start Hearing Code of Conduct, policies and procedures, and all applicable laws and regulations wherever the Provider does business in connection with the Start Hearing network.

“Provider” – Means a Covered Person participating as a healthcare Provider in the Start Hearing network.

“Good Faith” – Means the individual believes or perceives the information reported to be true.

“Intimidation” – Means (i) an act to manipulate another person and/or (ii) an intentional behavior that causes a person of ordinary sensibilities to have feelings of fear or inadequacy. Generally, an act of intimidation would include a deliberate act or behavior meant to deter an individual from reporting a compliance concern or participating and cooperating with an investigation. However, whether an act is considered intimidation is determined by the specific facts and circumstances of the particular case.

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“Retaliation” – Means an adverse action taken against an individual because the individual made a Good Faith report of a compliance concern or participation in a compliance investigation. An adverse action includes, without limitation: (i) termination, demotion, suspension, refusal to hire, and denial of training and/or promotion; (ii) actions affecting employment or contractual relationships such as threats, unjustified negative evaluations, unjustified negative references, or unjustified increased surveillance or scrutiny; or any other actions that are likely to deter a reasonable individual from reporting illegal conditions or violations of laws, rules, regulations, policies or procedures, and/or from cooperating with an investigation. Adverse actions do not include any employment action(s), disciplinary action(s), and termination(s) taken as a result of the individual’s own violation(s) of laws, rules, policies, or procedures, or negative comments in an otherwise positive or neutral evaluation, or negative comments that are justified by the individual’s poor work performance or history.

“Start Hearing” – Means Start Hearing, Inc. and all its affiliates.

Non-Compliance Detection and Prevention Process

Start Hearing detects Non-Compliance through activities and controls, which include the following:

- Healthcare Provider credentialing and re-credentialing policies and procedures
- Employee, contractor and downstream entity screening against the OIG and SAM/GSA exclusion lists
- Quality improvement practices
- Information system claims edits, such as appropriateness of services and level(s) of care, reasonable charges, and potential excessive over-utilization
- Post-processing review of claims and other claim analytics
- Claims review such as appropriateness of services, reasonable charges, and potential excessive over-utilization
- Ensuring appropriate training and other compliance commitments of contracted Providers
- Monitoring of customer complaints and grievances

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Reporting

Compliance Responsibility

Each Covered Person has an obligation to report suspected Non-Compliance or other suspected misconduct. If a Covered Person suspects misconduct has occurred, the individual should immediately report the incident to the Start Hearing Credentialing Department. As applicable, Start Hearing will, at a minimum, promote these reporting options as required by applicable law.

Appropriate disciplinary action, up to and including immediate termination of participation in the Start Hearing network, is taken against Covered Persons who have violated Start Hearing compliance policies, applicable statutes, regulations or federal or state healthcare program requirements.

Reports of suspected Non-Compliance should contain as much factual information as possible. To the extent possible, reports should, at a minimum, include the names of suspected wrongdoers, a description of the misconduct (including any supporting documentation or facts), and an explanation about how the reporting individual learned of the misconduct.

Confidentiality

To the extent reasonably possible, all communication to Start Hearing will be treated as confidential. Start Hearing maintains a strict policy of non-retaliation and non-intimidation for anyone who reports, in Good Faith, a possible violation of a law or regulation, or the violation of Start Hearing policies and procedures. Start Hearing assures the anonymity of complaints to the extent permitted by law.

No Retaliation/No Intimidation

Start Hearing will not permit or tolerate any form of Retaliation or Intimidation towards an individual who, in Good Faith, reports an incident of suspected Non-Compliance, including but not limited to reporting potential issues, investigating issues, conducting self-evaluations, audits and remedial actions, and reporting to appropriate officials. Any reporting should be made in Good Faith. Any individual who deliberately makes a false accusation with the purpose of harming or retaliating against another individual will be subject to discipline.

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Investigations

Investigations of Non-Compliance

When conducting investigations, Start Hearing may request records necessary to audit or conduct an investigation into allegations of Non-Compliance. Unless determined by Start Hearing's legal department, this right to audit or inspect does not extend to information subject to legal privilege.

The following summary provides an overview of the steps taken when Start Hearing receives a report of suspected Non-Compliance, though additional steps may be necessary depending upon the circumstances of each case.

- a. Upon receiving a report communicating Non-Compliance, Start Hearing will undertake an initial investigation into whether there is reason to believe the allegations have merit.
- b. Start Hearing may, among other things:
 - Review Provider database information.
 - Review paperwork submitted by the Provider to identify existence and scope of possible fraudulent activity.
 - Contact other Start Hearing departments for relevant information or obtain necessary information from outside sources, including the billing or treating Provider.
 - Analyze encounter data, billing, coding, or other information as circumstances warrant to develop data for further analysis and decision.
- c. Upon conclusion of the initial investigation, Start Hearing shall review assembled case file information and determine whether further investigation or action is warranted.
- d. Start Hearing shall be responsible for ensuring that any warranted further investigation takes place and shall issue a final determination with recommendations for process correction or disciplinary action as appropriate.

All Covered Persons are required to cooperate with investigations. Start Hearing prohibits Covered Persons participating in compliance investigations from discussing the investigation with anyone other than Start Hearing or their personal legal representatives. This maintains the integrity of the process and assures fairness to all involved. Failure to maintain confidentiality and/or failure to act may result in disciplinary action up to and including termination from the Start Hearing network.

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F. Corrective Action

In the event that Non-Compliance is discovered, Start Hearing must develop a corrective action plan designed to correct or eliminate the cause of the Non-Compliance. In certain instances, Start Hearing may need to work with and obtain approval from appropriate external agencies when developing the scope of any such corrective action plan. Consistent with applicable law, alleged over-payments will be promptly investigated, and, if identified, returned.

G. Coordination with External Agencies

Start Hearing coordinates all information requests and reporting, whether initiated internally or externally. Where required by law, and as otherwise appropriate, Start Hearing promptly refers suspected cases of Non-Compliance by Covered Persons to the appropriate regulatory agencies for further investigation. In addition, Start Hearing assists various governmental agencies as practicable in providing information and other resources during investigations of potential Provider fraud or abuse.

