Please plan to attend the annual Compliance and Ethics Conference to be held at the Sheraton City Center in Salt Lake City, Utah. This live group conference enables Blue Plans to better understand current trends impacting Plan compliance and ethics practices. Additionally, this event provides an excellent opportunity for networking and peer interaction. CPEs are available and no advance preparation is required.

**Overview of this Year’s Offerings:**

**Introduction to Compliance and Ethics (Basic Level Course)**
In this session, attendees will gain a basic understanding of healthcare-related compliance and ethics issues. This session is an excellent primer for new staff or staff members new to the compliance arena.

- Monday, March 13  8:30 a.m. – 4:15 p.m.
- Tuesday, March 14  8:30 a.m. – 12:00 p.m.

**Best Practices in Compliance and Ethics Roundtable (Advanced Level Course)**
This session is designed for compliance and ethics professionals who have significant experience in corporate compliance. Attendees will be encouraged to engage in a dialogue with their peers on topics within the area of compliance and ethics. Attendance is limited to 15.

- Monday, March 13  1:00 – 4:30 p.m.
- Tuesday, March 14  8:30 – 11:30 a.m.

**Hot Topics in Medicare A&B Compliance Roundtable (Advanced Level Course)**
This session is designed for professionals who have significant experience in Medicare compliance. Attendees will be encouraged to engage in a dialogue with their peers on topics within the area of Medicare compliance. Attendance is limited to 15.

- Monday, March 13  1:00 – 4:30 p.m.
- Tuesday, March 14  8:30 – 11:30 a.m.
Compliance and Ethics Conference (Basic, Intermediate and Advanced Level Course)
The conference provides an opportunity for attendees to learn about key issues influencing the compliance and ethics field.

- Tuesday, March 14  
  1:30 – 4:30 p.m.
- Wednesday, March 15  
  8:30 a.m. – 5:00 p.m.
- Thursday, March 16  
  8:30 a.m. – 12:00 p.m.

The registration fees are:

- $775 for the Introduction to Compliance and Ethics
- $175 for the Best Practices in Compliance and Ethics Roundtable
- $175 for the Hot Topics in Medicare A&B Compliance Roundtable
- $1,120 for the Compliance and Ethics Conference

For more information on the content of the meeting please contact Rick Abbott at 312.297.6066. For information regarding administrative policies such as registration, refunds and complaints, please contact the Conference Registrar 312.297.5825.

Who Should Attend?

Typically, attendees have included staff in the following departments: legal, compliance, privacy, human resources, and internal audit.

CPE Accreditation

Sponsored learning activities are measured by program length, with one 50-minute period equal to one CPE credit. One-half CPE credit increments (equal to 25 minutes) are permitted after the first credit has been earned in a given learning activity. Please note that not all state boards have adopted this rule. Some participants may not be able to use one-half credit increments.

The Blue Cross and Blue Shield Association is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be addressed to the National Registry of CPE Sponsors, 150 Fourth Avenue North, Nashville, TN, 37219-2417. Web site: www.nasba.org
PRELIMINARY AGENDA

Monday, March 13, 2006

PRE-CONFERENCE SESSIONS

8:00 a.m. – 4:30 p.m.  Registration

8:30 a.m. – 4:30 p.m.  Introduction to Healthcare Compliance and Ethics

Module 1: The Business Case for an Effective Compliance and Ethics Program
Harry Carstens
Assistant Vice President & Ethics and Compliance Officer
The Regence Group

Module 2: Code of Conduct
Deb Ziegler
Compliance Officer
Capital BlueCross

Module 3: Compliance and Ethics Program Components
Stan Absher
Senior Compliance Analyst
Blue Cross and Blue Shield of North Carolina

Module 4: Assessing Compliance Risk
Emil Moschella
Former Assistant General Counsel (Retired)
Horizon Blue Cross and Blue Shield of New Jersey

Module 5: Ethics
Harry Carstens
Assistant Vice President & Ethics and Compliance Officer
The Regence Group

1:00 – 4:30 p.m.  Corporate Compliance and Ethics Roundtable

Facilitator:
Garry Leavell
Director, Corporate Compliance Programs
Wellmark Blue Cross and Blue Shield

1:00 – 4:30 p.m.  Hot Topics in Medicare A&B Compliance Roundtable

Facilitator:
Robert Malinky
Vice President and Compliance Officer
First Coast Service Options
Tuesday, March 14, 2006

**PRE-CONFERENCE SESSIONS**

8:00 – 11:30 a.m.  
Hot Topics in Medicare A&B Compliance Roundtable (continued)

8:30 – 11:30 a.m.  
Corporate Compliance and Ethics Roundtable (continued)

**2006 COMPLIANCE AND ETHICS CONFERENCE**

8:00 a.m. – 5:00 p.m.  
Registration

1:00 – 1:15 p.m.  
Welcome and Opening Remarks

*Thomas F. Kennedy, Senior Vice President, Chief Compliance and Human Resource Officer*
*The Regence Group*

1:15 – 2:30 p.m.  
Keynote Address: WorldCom: What Went Wrong and Lessons Learned

*Cynthia Cooper, CPA, CISA, CFE, President*  
*Cynthia Cooper Consulting*  
*WorldCom Whistleblower and Time Magazine Person of the Year*

Cynthia Cooper, former Vice President of Internal Audit at MCI, is well-known for uncovering the corporate fraud at WorldCom – to date the largest corporate fraud in history. Along with her audit team, she discovered that “creative accounting” had turned millions of dollars in losses into billions in false profits. For her role in detecting and reporting this fraud, Ms. Cooper was named one of TIME Magazine’s Persons of the Year 2002.

In this dynamic keynote address, Ms. Cooper will discuss the governance failures at WorldCom that led to the $11+ billion financial fraud. Attendees will get a first-hand account of what really happened, gain an understanding of the factors that contributed to the downfall of the corporate giant, and leave with practical strategies for strengthening your governance function.

2:30 – 2:45 p.m.  
Break

2:45 – 3:45 p.m.  
The Top Ten Compliance Developments of 2005

*Kirk Nahra, Partner*  
*Wiley, Rein and Fielding, LLP*

This presentation will examine the most significant compliance developments of the past year for Blue plans, focusing on new compliance obligations, law enforcement developments and areas where compliance managers should be paying close attention in overseeing compliance activities.

3:45 – 4:00 p.m.  
Break
BREAKOUT SESSIONS I: Choice of Two Concurrent Sessions

CMS Compliance Program Certification Pilot Program (CLOSED SESSION)

Anne Crawford, RN, MS, FAHM, Director, Medicare C & D Compliance Officer
Highmark, Inc.

The Centers for Medicare & Medicaid Services (CMS) established the
Compliance Program Certification Pilot Program for Medicare Advantage
organizations as an alternative Medicare managed care monitoring strategy. This
is a voluntary pilot project for Medicare Advantage Organizations to submit to a
comprehensive review of their compliance program and establish regular
reporting of self-monitoring and auditing to the CMS Regional Office. Highmark
recently earned the designation of “Centers for Medicare & Medicaid Services
(CMS) Certified Compliance Program.” In this presentation, gain insight on the
advantages of a robust compliance program and achieving this designation for
your MA organization.

Ethics Events That Engage Employees

Shanna Marzilli, Corporate Compliance Officer and Assistant Vice President,
Corporate Compliance and Ethics
Blue Cross and Blue Shield of Rhode Island

Keeping compliance and ethics fresh for employees can be challenging. This
session will provide an overview of some of the ethics communications and
training events used by Blue Cross & Blue Shield of Rhode Island, including a
live ethics game show, a Compliance & Ethics Day at the Movies and the Ethics
Book Club.

Free Time

5:30 – 7:30 p.m.

Table Topics and Evening Networking Reception

Table Topics include:
- Ethics Communications @ BCBS Louisiana
- Communicating with Key Departments
- Monitoring the Effectiveness of your Compliance Program
- Compliance Communications @ BCBS North Carolina
- Medicare Advantage Monitoring
- Records Management
- Compliance Training: Making it Informative Yet Fun
- The 7 Elements of an Effective Compliance Program
Wednesday, March 15, 2006

7:00 – 8:00 a.m. Continental Breakfast

8:00 – 9:15 a.m. BREAKOUT SESSIONS II: Choice of Two Concurrent Sessions

The State of Recent White Collar Health Care Fraud Prosecutions

Sheldon Zenner, Partner
Katten Muchin Rosenman LLP

The state of the law with respect to corporate compliance continues to be a fast moving target in both the health care and insurance industries. As the daily headlines involving the New York Attorney General's Office, the Department of Justice and the Securities and Exchange Commission clearly evidence, the heat is still on. Maintaining compliance with all applicable federal and state laws remains an interest of paramount concern to all professionals. Attendees will be provided an assessment of what the future holds and what companies can do to stay on the right side of the line at all times.

How to Promote an Ethical Culture

Jim Bixler, Vice President, Ethics & Compliance
WellPoint, Inc.

The expected corporate culture must be one where compliance with the law is the expected behavior. For a company to have a successful Ethics & Compliance program, it must be promoting an ethical culture. It is one of the key areas highlighted in the updated Federal Sentencing Guidelines in 2004. This session will demonstrate how using your core values, communicating your ethics and compliance program to your associates and providing them effective training programs will help develop and nurture a corporate culture that embraces and emphasizes compliance and ethics.

9:15 – 9:30 a.m. Break

9:30 – 10:45 a.m. BREAKOUT SESSIONS III: Choice of Two Concurrent Sessions

Developing Interactive Exercises for Business Ethics Training

Garry Leavell, Compliance Director
Wellmark Blue Cross and Blue Shield of Iowa

Most plans develop in-house classroom training programs to educate staff about business ethics issues and how the plan's Code of Conduct relates to day-to-day activities for both leaders and other employees. A key to effective classroom training is utilizing interactive exercises that keep the participants engaged and involved, and provide the opportunity for them to learn from their peers as well as the facilitator. This interactive workshop will explore some innovative approaches to developing and presenting classroom exercises that are being used at Wellmark Blue Cross Blue Shield.
How to Conduct an Internal Investigation

Lazar P. Raynal  
McDermott Will & Emery LLP

Mr. Raynal will discuss important aspects of conducting internal investigations in response to reported allegations of misconduct and investigations by governmental authorities. The discussion will include the importance and mechanics of early data and information preservation, as well as conducting interviews, decisions about whether to create internal reports and dealings with authorities. Mr. Raynal regularly conducts internal investigations and defends companies in response to State and Federal investigations.

BREAKOUT SESSIONS IV: Choice of Two Concurrent Sessions

Compliance Risk Identification, Validation, & Monitoring at Premera Blue Cross (CLOSED SESSION)

Bren Schwab, Compliance Administrator  
Steve Wilkendorf, Compliance Manager  
Premera Blue Cross

This session will demonstrate how the risk identification and assessment process at Premera Blue Cross was developed and implemented, as well as share any lessons learned. The presenters will provide participants with a frame of reference for developing their own risk identification and assessment process, as well as provide participants with tools they can use or modify for their own risk identification and assessment processes.

Plan HIPAA Privacy Compliance Monitoring

Adam Birnbaum, Project Manager, HIPAA Privacy  
Blue Cross and Blue Shield Association

This session will cover the primary areas necessary to monitor to ensure Privacy compliance with the HIPAA regulations. It will entail why these business areas and functions should be monitored and potential ways to do the evaluation. Open forum time will be permitted to allow Plans to share best practices.

Lunch
BREAKOUT SESSIONS V:  *Choice of Two Concurrent Sessions*

**Training Programs that Make an Impact and Add Value to Your Organization**

*Pam Whitelock, Director, Ethics & Compliance*  
*WellPoint, Inc.*

The amended Federal Sentencing Guidelines states that an organization shall take reasonable steps to conduct effective training programs and disseminate information appropriate based on roles/responsibilities. The goals of this presentation are to consider the “value” and “methods/processes” of the ethics and compliance training program to enable the conference attendees to be better equipped to answer and respond to the following types of questions:

- Can you measure the effectiveness of your training program?
- What steps can be taken to evaluate the effectiveness of the training program?
- How can you customize your training program to take into account roles and responsibilities of your associates?
- What type of internal resources can I tap into to help promote an ethical and compliant culture?
- How do you reach associates to make them realize that the training applies to them – versus someone else?

**Additional Accounting Compliance for Medicare Government Contracting**

*Representative from Huron Consulting Group*

Legislative changes in the Medicare Contracting environment will require additional efforts for those entities that continue to remain in the Medicare fee for service business. One of the key changes is the government's requirement that, in addition to cost allowability rules mandated by the Federal Acquisition Regulations (FAR), successful offerors must now adhere to allocability cost rules mandated by the Cost Accounting Standards (CAS). This session will explore what this means for potential offerors and what changes must be made to the ways administrative costs are accumulated and reported to the government.

2:15 – 3:30 p.m.

BREAKOUT SESSIONS VI:  *Choice of Two Concurrent Sessions*

**Electronic Health Records (EHR) - Privacy and Ethical Considerations**

*Jean Butler, Senior Manager and Pauline Rosenberg, Privacy Official*  
*Blue Cross and Blue Shield of Florida*

This presentation will provide a brief overview of the evolution of electronic health records, including the Bush administrations creation of the Office of the National Coordinator for Health Information Technology in DHHS with the goal of having EHRs universal by 2015. The presentation will also discuss the basic tenets in the establishment of the HIPAA-AS Privacy regulations and Privacy Rule obligations, primarily from a health plan perspective, and in light of the opportunities and challenges that health information technology brings.
Recent Medicare Secondary Payer (MSP) Enforcement Initiatives

Christopher Janney, Partner – Health Care
Deborah Ziegler
Sonnenschein, Nath and Rosenthal LLP

Over the past two years, the U.S. Department of Justice (DOJ), the Centers for Medicare & Medicaid Services (CMS) and private whistleblowers have undertaken a number of initiatives, involving both payers and providers, relating to compliance with the Medicare Secondary Payer (MSP) statute. These initiatives have involved a range of allegations, including the failure of payers to comply with the MSP statute’s small employer "exception" and "election" requirements and the statute's non-discrimination provisions. The presenters, who have counseled a number of the payers (and providers) who have been targeted by these initiatives, will provide an overview of current MSP risk areas along with a list of related compliance program practice tips.

3:30 – 3:45 p.m.

Break

3:45 – 5:00 p.m.

BREAKOUT SESSIONS VII: Choice of Two Concurrent Sessions

Medicare Part D: Overview, Impact on Seniors, and Compliance Concerns

Christian Presley, President
CPS Triad Consulting Group
Kenneth M. Bruntel, Partner
Crowell and Moring

This presentation will provide an overview of Medicare Prescription Drug Coverage which became available pursuant to the Medicare Modernization Act of 2003 (MMA). It will discuss the benefits available, the broad parameters for prescription drug programs to be certified under Medicare, and the impact on Medicare beneficiaries and dual eligibles. The presentation will also touch briefly on compliance concerns associated with the new benefit.

Managing Effectively a Civil False Claims Act Investigation

John Domeika, Senior Vice President and General Counsel
Nabil Istafanous, Vice President, Compliance and Ethics
Premera Blue Cross

The goal of this presentation is to discuss how to work with the General Counsel to conduct an effective internal investigation into issues implicating the Civil False Claims Act. The presentation will also give practical advice on how to effectively manage a Qui Tam Civil False Claims Act investigation. The presentation will cover topics such as:

- Conducting an Effective Investigation to hopefully prevent a Qui Tam Civil False Claims Claim
- First steps upon receipt of subpoena
- Selection of counsel
- Retention of documents
- Communications to Affected Employees
- Employee interviews
- Effective presentations of Facts and Law

5:00 – 7:00 p.m.

Exhibitor Fair and Reception
Continental Breakfast

8:00 – 9:15 a.m.  Compliance Requirements for Medicare Advantage and Medicare Prescriptions Drug Plans

Jane Galvin, Director, Regulatory Affairs
Blue Cross and Blue Shield Association
Mary Wickens, Attorney & Counselor, PLC
Wickens Law

In this session, Jane Galvin will discuss current initiatives within CMS in the early months of the new Medicare benefit and provide an overview of national and regional enrollment results to date, as well as the issues that CMS is focused on as they move forward with implementation. Ms. Wickens will identify the legal and regulatory requirements for compliance programs and plans, and will consider the role and impact of certifications and discuss industry best practices. More specifically, Ms. Wickens will cover:

- Background and history of compliance programs for Medicare Part C and Part D contractors.
- Federal False Claims and Anti-kickback issues in Medicare Part C and Part D.
- Compliance requirements found in the law, regulations and contracts with CMS.
- Your certifications submitted to CMS and their role and impact in compliance.
- HHS-OIG voluntary guidance for plans and what to anticipate from the OIG in audits and investigations.
- The role of the MEDICs (Medicare Integrity Contractors) in your compliance program.
- Compliance issues for self-funded employer groups that seek Medicare funds for “retiree” drug coverage.
- Special risk assessments for Medicare Advantage and Medicare Prescription Drug Plans.

Break

9:15 – 9:30 a.m.

9:30 – 10:30 a.m.

BREAKOUT SESSION VIII: Choice of Two Concurrent Sessions

Promoting and Providing Incentives for Ethical Behavior Roundtable

Facilitors:
Eddy Chapman, Assistant Director, Ethics and Compliance Officer
Jackie Yerby, Assistant Director, Ethics and Compliance Officer
The Regence Group

Many Plans struggle with the question of how to promote an ethical culture and how to provide incentives for ethical behavior. This roundtable will look to share ideas for addressing this key element of the Federal Sentencing Guidelines. Be prepared to share your ideas and engage in a valuable dialogue.

Blue Plan Compliance & Ethics Peer Review Project (CLOSED SESSIONS)

Steven Fleisher, JD, Director, Corporate Compliance
Blue Shield of California

This session will describe the work performed by the multi-Plan Compliance and Ethics Peer Review Project group.

Break

10:30 – 10:45 a.m.
10:45 a.m. – 12:00 p.m.

C Suite or Cell Block: Is Your Compliance Strategy Effectively Reducing Your Risks?

Sheryl Vacca, CHC, Director, National Health Care Compliance Practice
Deloitte & Touche

Organization's risks are not just the obvious ones related to regulatory dos and don'ts but can also be found throughout the organization's business operations. These business operations may not even be aware they are conducting "risky and/or non-compliant" activities which could put the overall organization and its employees at great risk. This session will focus on strategies for assuring business compliance risks are identified and discuss methods for effectively reducing these risks to avoid "jail time".

12:00 p.m.

Adjournment
Registration Information and Policies

Important: Please read before completing registration form.

Three Easy Ways to Register!

Payment is required at the time of registration.
Confirmations will be sent upon receipt of registration and payment.

1. **To register online:**
   Go to http://www.bcbs.com/events
   Login: BlueEvents
   Password: register
   Locate the 2006 Compliance and Ethics Conference
   Click on the link to register
   Note: You may register online by check or credit card. Registrations made by check should be sent to the address listed below with a copy of the registration form.

2. **To register via Fax:**
   Fax your completed registration form, including credit card information, to the Conference Registrar at 312.297.6920.

3. **To register via Mail:**
   Mail your completed registration form with your check or money order, payable to Blue Cross and Blue Shield Association, to:
   Blue Cross and Blue Shield Conferences
   75 Remittance Drive, Suite 3091
   Chicago, IL 60675-3091

Payment
Payment must accompany registration form.

Payment options include checks (made payable to Blue Cross and Blue Shield Association), money orders, VISA, MasterCard, American Express, Diner's Club or Discover.

The registration fees include conference materials and meals as specified in the agenda. Guestrooms and transportation are the responsibility of the attendee.

Cancellation
To receive a full refund, written cancellations must be received by Monday, February 13, 2006. Written cancellations received from Tuesday, February 14 to Tuesday, February 28, 2006 will be charged 50% of the program fee. No refunds will be issued for cancellations received after Tuesday, February 28, 2006. Registration fees for cancelled registrants cannot be applied or credited for future conferences.

Substitutions
Registrant substitutions will be accepted only with written notification from the original registrant. No administration fee will apply to substitutions; however, only one substitution may occur per registrant.

No-Shows
Registrants who do not cancel prior to the conference and do not attend will be responsible for the full registration fee.

Questions?
For questions regarding registration or payment, please contact the Conference Registrar at 312.297.5825. For questions about the content of the program, please call Rick Abbott at 312.297.6066.
Location

Sheraton City Centre
150 W. 500 S.
Salt Lake City, UT 84101
Phone: 801.401.2000
Guest Fax: 801.534.3450

Reservations

$139 single / double occupancy + tax, currently at 11.2%
Check in: 3:00 p.m./Check out: 12:00 p.m.

Participants should make their hotel reservations by calling the hotel directly at 801.401.2000. You must indicate that you are attending the Blue Cross and Blue Shield Association Compliance and Ethics Conference to receive the special rate. A one night’s room and tax deposit is required on all room reservations and is refundable if cancellation is received at least 72 hours prior to day of arrival.

The last day to make hotel reservations is Friday, February 17, 2006. Reservations made after this date will be honored based on space and rate availability.

Airline Discounts

Contact your travel agent for any available discounts.

United Airlines:
For Blue Registrants: Contact your travel agency and ask for the negotiated Corporate Rate.

Delta Airlines:
When making your reservation, ask your travel agent or a Delta representative, to refer to the SkyBonus number US822502772.

Airport
The Sheraton is located 15 minutes from Salt Lake City Airport.

Ground Transportation

Taxi Service
Taxi service from Salt Lake City Airport is approximately $15-20 one-way.

Shuttle Service
A complimentary Hotel shuttle service to and from the Salt Lake City International Airport is available from 6:00 a.m. to 11:30 p.m. daily.
OR
Express Shuttle is the available, call 800.397.0773 to make your arrangements. Service is $7 one-way.

Parking
Valet parking is $9 and self-parking is $7 per day.

Auto Rental Discounts
Enterprise and Hertz provide discounted rates and unlimited free mileage up to one week before and after the meeting dates. Make your reservation using the phone numbers and discount identification numbers below.

Enterprise
800.736.8222
Discount ID# NA15B01

Hertz
800.654.3131
Discount ID# 24383
Program Registration

Compliance and Ethics Conference  March 13 - 16, 2006
Sheraton City Centre
Salt Lake City, Utah

Full payment must accompany your registration. A confirmation letter will be sent to you upon receipt of your registration form and payment. Please use this form, and be sure to register early, as the program will reach capacity quickly. Please be advised: BCBSA is not responsible for checks or registrations lost or delayed in the mail.

Please complete the information below. Complete a separate registration form for each registrant. You may photocopy this form.

Please check which program(s) you will attend:

Introduction to Compliance and Ethics  $775
Best Practices in Compliance and Ethics Roundtable  $175
Hot Topics in Medicare A&B Compliance Roundtable  $175
Compliance and Ethics Conference  $1,120

Credit Card Payments - Total charge to credit card $  

☐ MasterCard  ☐ VISA  ☐ American Express  ☐ Discover  ☐ Diner’s Club

Card Holder’s Name (Print)  Signature  Date

To pay with credit card, FAX a copy of your registration form to the Conference Registrar at 312.297.6920.

To pay with check, make checks payable to Blue Cross and Blue Shield Association, include meeting code #Q01-03Q-544 and a copy of your registration form. Mail to:

Blue Cross and Blue Shield Conferences
75 Remittance Drive, Suite 3091
Chicago, IL 60675-3091

Cancellation Policy

Written cancellations received from Feb. 14 through Feb. 28 will be charged 50% of the program fee. Although refunds cannot be made for cancellations received after Feb. 28, substitutions to attend this conference are permitted with no penalty. Late registrations are subject to availability.