Disciplinary Action for Compliance Violations

To ensure that all OneShare Health ("OSH") contracted enrollment partners are aware of corrective/disciplinary measures to be taken upon noncompliance with OneShare's policies and standards, OneShare has adopted this policy, applicable to all individuals and entities contracted with OneShare to market to and enroll new members in OneShare programs.

Noncompliant actions by partners are broken into two categories: "**Basic**" infractions and "**For Cause**" infractions. All partners are judged on rolling 6-month and 12-month time frames, depending on the level of discipline. For Basic infractions, the ramifications from OneShare could include the following: written warning, acknowledging the receipt of written materials, training, Secret Shopping, required recorded voice verifications, suspension, and ultimately termination. The ramification for a For Cause infraction is termination for cause. OneShare reserves the right to bypass any level of discipline in its discretion.

"Basic" infractions:

- Failing to conduct a recorded voice verification for an enrollment, if required by OSH.
- Using marketing material/communication not approved by OSH.
- Use of a single enrollment link by multiple individuals.
- Allowing a non-contracted individual to conduct enrollment activities, such as describing the programs or discussing how a program fits the prospective member's needs. This does not include intake activities or enrollment verification.
- Submitting an incomplete member application or failing to ask all required questions of an applicant.
- Failing to disclose program limitations during an enrollment, such as waiting periods, cancer limits, or per incident or lifetime sharing maximums. If information provided by the applicant indicates one of the limitations is likely applicable and applicable information is not provided, the infraction may be escalated.
- Soliciting memberships in a jurisdiction not allowed by OSH.
- Stating to a potential member that there are a limited number of memberships available or slots open.
- Stating there is a limited time offer.
- Offering any inducement for membership.
- Making any statement or representation that could be construed as adjustment or settlement of any need for sharing.
- Failure to timely or completely respond to producer statement requests from OSH.

"For Cause" infractions

- Using marketing material/communication which contains a *material* misrepresentation of a program.
- Misrepresenting any program as having features or attributes which it does not have.
    - Examples include telling a prospective member that services for their pre-existing condition would be shared or portraying a condition as being eligible for sharing when it is ineligible.
- Using high pressure sales tactics to coerce a consumer into enrolling in a membership. High pressure sales tactics include the use of threats, intimidation, fear, bullying, etc.
- Refusing to provide membership information to a consumer in advance of the final enrollment. If an applicant requests a brochure or copy of the guidelines in advance of enrollment, these are readily available in the producer resource hub.
- Representing that the programs offered constitute insurance or healthcare coverage or benefits or an ACA compliant insurance plan ("ACA-exempt" is permissible; "ACA-compliant" is not). This includes the use of insurance terminology to describe the OneShare programs.

- Representing that the program creates any legal obligation or assumption of risk by OSH, or that bills are guaranteed to be shared among members.
- Providing false information regarding program limitations during an enrollment, such as the waiting periods, cancer limits, or per incident or lifetime sharing maximums.
- Misrepresenting the discount plan as an insured product or that it is operated by OneShare. The discount plan is not insurance and made available by a third party.
- Any act of fraud, dishonesty, failure to disclose material information, giving false or misleading information, theft, or misappropriation of money.
- Falsifying any part of the enrollment application, including the producer signing the member agreement.
- Violation of any telemarketing laws, including the use of robocalls.

The levels of discipline for noncompliant actions by enrollment partners are below. OneShare reserves the right to bypass any level of discipline in its discretion. OneShare may also subject entire groups (for example, all partners in a single call center) to disciplinary action, if multiple individuals within the group are noncompliant.

	Trigger	OSH Action	Requirements
Level 1	One Basic infraction	Written Warning	Written materials provided to the partner, who responds in writing that they have reviewed and understand the materials. Possible Secret Shop within 30 days
Level 2	Two Basic infractions in any rolling 6-month period OR One Secret Shop failure	Written Warning	1:1 training provided to the partner. Possible Secret Shop within 30 days Recorded voice verifications required until partner is infraction-free for 6 months
Level 3	Three *combined* Basic infractions / Secret Shop failures in any rolling 6-month period OR One failure to complete required training	Suspension	1:1 training required for partner and manager Possible Secret Shop within 30 days after end of suspension and again once more at random within the following 6 months Recorded voice verifications required until partner is infraction-free for 12 months
Level 4	Five *combined* Basic infractions / Secret Shop failures in any 12-month period	Termination	
Level 5	One "For Cause" infraction	Termination For Cause	