

**BLUE CROSS BLUE SHIELD ASSOCIATION STEP-BY-STEP
HOW TO FILE A COMPLIANCE DISPUTE
September 8, 2008**

Listed below are the steps to take to challenge a violation of the terms of section 7 of the Settlement Agreement. Section 7 lists the business practice changes to which the Blue Parties have committed.

1. Any physician who has not opted out of the Settlement may file a compliance dispute with the Class Compliance Dispute Facilitator, Deborah J. Winegard. Compliance disputes must be filed within 90 days of the date the dispute arose or was reasonably discovered.
2. Signatory Medical Societies are also able to file complaints on behalf of their members and assist physicians from any state with questions regarding the Settlement. For a list of these societies, see www.hmosettlements.com.
3. The Compliance Dispute Form and section 7 of the Settlement Agreement are also available at www.hmosettlements.com.
4. The form must be completed by the physician or his or her office staff, and must include the physician's signature. The name of the contact person in the physician's office should also be provided if possible. The physician should describe, using specific facts, the Blue Party's conduct which he or she believes constitutes a material breach of its obligations under section 7 of the Agreement. The physician should also specify, if possible, which provision of section 7 has been breached, and describe how he or she has been harmed by the breach.
5. The physician should attach to the form any supporting documentation, including any correspondence between the physician and Blue Party, and any records which the physician believes are relevant for the Class Compliance Dispute Facilitator to determine the merits of the complaint.
6. The complete form and attachments should be mailed or submitted electronically to the Class Compliance Dispute Facilitator at the address below. **NO FEE IS REQUIRED.**
7. After the Class Compliance Dispute Facilitator receives the Compliance Dispute Form, she will contact the physician to advise whether the form is properly completed, and whether, in her opinion, the alleged wrongful conduct is a compliance dispute.
8. The Class Compliance Dispute Facilitator will prosecute the dispute on the physician's behalf without charge, and will keep the physician informed as the compliance dispute progresses.

9. The contact information for the Class Compliance Dispute Facilitator (other than Empire Blue Cross Blue Shield) is:

Deborah J. Winegard
c/o Neubert, Pepe & Monteith, PC
195 Church Street
New Haven, CT 06510
FAX: 203-821-2009
Phone: 404-607-8222
E-mail: dwinegard@gmail.com

PLEASE NOTE: For Compliance Disputes involving Empire Blue Cross Blue Shield, Empire uses the Compliance Dispute process utilized under The Wellpoint Settlement Agreement. The contact information for the Class Compliance Dispute Facilitator is:

Cameron C. Staples
Neubert Pepe & Monteith, PC
195 Church Street, 13th Floor
New Haven, CT 06510
Phone: 203-821-2000
FAX: 203-821-2008
Email: wellpointcomplaint@npmlaw.com