



Policy and Procedure No: CO 14.4		Revision No: 4
Division: Care Management		
Department: Compliance		
Title: PHC-CA U.S. Patriot Act		
Effective Date: 11/1/2009		
Supersedes Policy No: CM 215.0, CO 14.0, CO 14.1, CO 14.2, CO 14.3		
Reviewed/Revised by: Sandra Holzner		Review/Revision Date: 12/13/2025
Approving Committee: Compliance Committee		Date: 12/15/2025
Executive Oversight Committee Date: 12/16/2025		

Purpose:

To provide guidance to PHC California (the Health Plan) regarding the implementation of Executive Order 13224 Blocking Property and Prohibiting Transactions with Persons Who Permit, Threaten to Commit, or Support Terrorism.

Policy:

The Health Plan complies with Executive Order 13224 regarding terrorists and terrorist support organizations and has implemented appropriate procedures to detect and prevent transactions prohibited by the Executive Order.

Procedure:

1. No less than twice a year, the Health Plan’s Compliance Department review’s the Specially Designated Nationals (“SDN”) list posted on the US Department of Treasury’s website and compare it to the members in the Health Plan and its providers. The SDN list is available at https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/sdn_data.aspx.
2. If the Health Plan discovers a match, the Health Plan will promptly notify:
 - a. the Office of Foreign Assets Control, U. S. Department of the Treasury, Washington, D.C., 202-622-2520
 - b. Coordination at 850/413-4259)
 - c. Centers for Medicare & Medicaid Services (CMS) or the Department of Health Care Services (DHCS) as applicable, for instructions on disenrolling any matching member
3. The Health Plan will promptly terminate any matching provider and cease payments to that provider and follow any further instructions provided by the federal or state agencies.

Definitions:

1. AHF: AIDS Healthcare Foundation and its affiliates/subsidiaries who offer managed care health plans or programs.
2. Executive Order 13224: In response to the terrorist attacks in New York, Pennsylvania, and the Pentagon committed on September 11, 2001, President Bush issued an Executive Order, effective September 24, 2001. The Order provides that property and interests in property of those persons and

entities listed in the Annex to the Executive Order that are either in the United States or come into the United States are blocked. The Order further prohibits any transactions by United States persons with respect to the blocked interests. This prohibition includes the making or receiving of any contribution of funds, goods, or services to or for the benefit of those persons or entities listed in the Annex to the Order or otherwise determined to be subject to the Order. Finally, the Executive Order provides a mechanism pursuant to which federal authorities may identify additional persons or entities who are subject to the Order.

Monitoring:

This policy is updated, as necessary, reviewed and approved every year by the Care Management Compliance Committee.

Reference(s):

1. Executive Order 13224 (Sept. 24, 2001)
2. Informational Bulletin 01-002, Issued 10/09/2001 by the Florida Department of Insurance, Tom Gallagher, Treasurer, Insurance Commissioner and Fire Marshal

