

ONECARE

Policy Name: Distribution of Compliance Policies, Anti-Fraud Plan, HIPAA Training Slides & Standards of Conduct for Vendors and/or First-Tier, Downstream & Other Related Entities (FDRs)

Policy Number: MA1011

Department: Compliance

Original Effective Date:

Page(s) : 4

Applies to:

- AHCCCS
- DDD
- MEDICARE

1.0 PURPOSE:

To formally document procedures in distributing Care1st Health Plan Arizona, Inc./Care1st by Care1st Health Plan Arizona, Inc. (Care1st) Care1st Compliance Policies and Procedures (P&Ps), Anti-Fraud Plan for Vendors, HIPAA Training Slides and Care1st's Standards of Conduct for Vendors (SoC) and/or first tier, downstream entities and related parties (FDR).

2.0 POLICY STATEMENT:

As part of Care1st's compliance strategy to achieve an effective compliance program, Care1st distributes its Standards of Conduct for Vendors, its Anti-Fraud Plan for Vendors, and/or FDRs, its HIPAA Training Slides and its Compliance Policies in order to communicate compliance expectations to Care1st's FDRs, and FDR employees, with regards to the administration of Medicare Part C and Part D programs.

Distribution must occur within 90 calendar days from contract for newly contracted FDRs and annually, thereafter. The distribution methods will be a) through the Care1st Health Plan's website or b) through Provider Newsletter, Bulletins, special mailings, e-mails, and other forms as appropriate.

3.0 AUTHORITIES AND REFERENCES:

- Medicare Managed Care Manual – Chapter 21, Compliance Program Guidelines, section 50.1.3
- 42 Code of Federal Regulations (CFR) - §422.503(b)(4)(vi)(A)
- 42 CFR §422.504(b)(4)(vi)(A)

4.0 DEFINITIONS:

N/A

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5.0 OPERATING PROTOCOL:

Newly Contracted FDRs

During the contracting process, Provider Network Operations (PNO) provides a cover letter with the following attachments:

- Provider Agreement(s) and Attachments
- Compliance Requirements for Contract Execution

The compliance requirement attachment informs the FDR that prior to executing their agreement, both attestations are needed as proof the FDR received the training materials and rolled them out to staff. The attestations are:

- Fraud, Waste, & Abuse Training Attestation
- Policies & Procedures, Anti-Fraud Plan, Standards of Conduct for Providers, and HIPAA Training Attestation

The FDR contract is not executed if the attestations are not received by PNO.

Annual Distribution

1. The Compliance Department coordinates with PNO in obtaining contact information for Care1st's FDRs for the annual distribution of our Compliance P&P and the SoC.
2. The Compliance Department coordinates with PNO to create the blast fax for distribution. The blast fax notifies our FDRs of the requirement to distribute Care1st's SoC, and P&Ps along with instructions related to the distribution process. The blast fax also indicates that a completed attestation form must be returned to Care1st upon completion of the distribution process.

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3. The completed attestation form is returned to the Compliance Department via online portal, fax, e-mail, or mail. Compliance logs and tracks attestations.
4. Attestations are retained in accordance with the Centers for Medicare & Medicaid Services (CMS) record retention requirement of 10 years.

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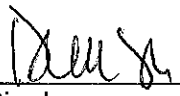
6.0 REVISION HISTORY

Date	Reviewed/Revised By:	Reason for change
7/2017	Patty Dal Soglio	Annual Review
6/2016	Patty Dal Soglio	Annual Revision
6/2015	Patty Dal Soglio	Annual Revision
4/2014	Nizhoni Smith	Annual Revision
7/2013	Nizhoni Smith	Policy Creation


7.0 CORPORATE APPROVAL:



Scott Cummings
President



Deena Sigel
Vice President, Field Finance



Susan Cordier
Chief Operating Officer, State