



## POLICY & PROCEDURE CORPORATE COMPLIANCE

**Policy Title:** Distribution of Compliance Policies and Procedures (P&Ps), Anti-Fraud Plan (AFP), and Standards of Conduct (SoC) to Vendors and/or First-Tier, Downstream, and Other Related Entities (FDRs)/Sub-Contractors

**Policy No:** 70.17.39

**Original Date:** 5/2013

**Effective Date:** 4/2016

**Revision Date:** 4/2016

**Revision No:** 1

**Department Head:**

**Date:**

4-11-2016

**P&P Committee:**

**Date:**

4/7/16

**Scope of Coverage:**

All Lines of Business

### PURPOSE:

To formally document procedures in distributing Care1st Corporate Compliance Policies and Procedures (P&Ps) and Care1st's Standards of Conduct (SoC) for Vendors and/or FDRs/Sub-Contractors.

### POLICY:

As part of Care1st's compliance strategy to achieve an effective compliance program, Care1st Health Plan distributes its Standards of Conduct for Vendors, its Anti-Fraud Plan (AFP) for Vendors, and/or FDRs and its Corporate Compliance Policies and Procedures in order to communicate compliance expectations to Care1st's FDRs/Sub-Contractors, and their employees and downstream contractors.

**Distribution must occur within 90 calendar days from contract for newly contracted FDRs/Sub-Contractors and annually, thereafter. The distribution methods will be**  
a) **Furnishing hard copies at the time of contract and electronic copies thereafter; or**  
b) **through Compliance Newsletter for FDRs, Bulletins, special mailings, e-mails, and other forms as Care1st's Management sees appropriate.**

### PROCEDURE:

1. The Corporate Compliance Department obtains FDRs/Sub-Contractors' contact information (names, addresses, e-mails, etc.) from internal departments through the completion of the FDR Tracking Tool Form that must be included in the Contract Routing Sheet (for new contracts); or the Compliance Department reaches out to the internal departments to complete the FDR Tracking Tool Form for their existing contracts.

2. The Corporate Compliance Department compiles the materials for distribution and then sends the materials via e-mail to the contact person identified on the FDR Tracking Tool Form.
  - a. The materials contain an Attestation Form that is to be completed by the FDR/Sub-Contractor and returned to Care1st Corporate Compliance Department.
  - b. Regular follow-ups are made by the Compliance Staff for those Attestations that have not been completed or returned.
3. The frequency of distribution is **annually** for current contracted FDRs/Sub-Contractors and **within 90 calendar days** from the effective date of the contract for new contracted FDRs/Sub-Contractors; and, annually thereafter.

#### **REFERENCES/AUTHORITIES:**

- Care1st's Policy and Procedures 70.17.38 – *Compliance Expectations from First-Tier, Downstream, and Other Related Entities*
- Medicare Managed Care Manual – Chapter 21, Compliance Program Guidelines, section 50.1.3, Rev 109, 7/2012
- 42 Code of Federal Regulations (CFRs) - §422.503(b)(4)(vi)(A)
- 42 CFR §422.504(b)(4)(vi)(A)