



CARE1ST HEALTH PLAN

POLICY & PROCEDURE

Corporate Compliance Department

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)		
Policy No: 50.17.20	Orig. Date: 11/2012	
Effective Date: 7/2014	Revision Date: 4/2015	Revision No: 1
P&P Subcommittee Approval:  Date: 4/23/15		
Board Approval: 	Date: 4/23/15	Scope of Coverage: Medicare/MAPD and MMP

PURPOSE:

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

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 for Vendors, and/or FDRs and its Corporate Compliance Policies and Procedures in order to communicate compliance expectations to Care1st's FDRs, and FDRs employees, with regards to the administration of Medicare-Medicaid Plan (MMP), and 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 at <https://www.care1st.com/ca/providers/compliance.asp?section=StandardsOfConduct>; b) furnishing hard copies at the time of contract and electronic copies thereafter; or c) through Compliance Newsletters, Provider Newsletter, Bulletins, special mailings, e-mails, and other forms as Care1st's Management sees appropriate.

PROCEDURES:

1. The Corporate Compliance Department obtains FDRs' contact information (names, addresses, e-mails, etc.) from internal departments with Medicare and MMP accountabilities and/or responsibilities or the Compliance Department obtains a completed FDR Tracking Analysis Tool. The Compliance Department, in collaboration with Care1st's internal departments (e.g., Provider Network Operations (PNO), Claims, Pharmacy, Finance, Credentialing, Contracting, Human Resources, etc.), releases a *formal letter* signed by the Corporate Compliance Officer informing Care1st's FDRs to obtain copies of Care1st's SoC, AFP, and P&Ps via the link <https://www.care1st.com/ca/providers/compliance.asp?section=StandardSoCofConduct> and other instructions related to the distribution process. The letter also indicates that a completed attestation form must be returned to Care1st upon completion of the distribution process.
 - a. The completed attestation form is returned to the Corporate Compliance Department via fax, e-mail, or mail.
 - b. Attestations are retained in accordance with the Centers for Medicare & Medicaid Services (CMS) record retention requirement of 10 years.
2. The frequency of distribution is **annually** for current contracted FDRs and **within 90 calendar days** from date of contract for new contracted FDRs and annually thereafter.

Authorities and References:

- Medicare Managed Care Manual – Chapter 21, Compliance Program Guidelines, and Prescription Drug Benefit Manual (PDBM) Chapter 9, Rev. 1/11/2013
- 3-way Contract with DHHS/CMS, DHCS, and Care1st Health Plan
- 42 Code of Federal Regulations (CFRs) - §422.503(b)(4)(vi)(A)
- 42 CFR §422.504(b)(4)(vi)(A)