## First Tier, Downstream, and Related Entities (FDR) Medicare Compliance Program Self-Assessment Tool

Organization Name:	Date of Self-Assessment:
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**Objective:** To validate an organization's compliance with specific Medicare Compliance Program requirements as required by the Centers for Medicare & Medicaid Services (CMS) of CHRISTUS Health Plan's Medicare Advantage and Prescription Drug Plan products.

**Instructions:** After review of the procedures, documents or other materials, select whether there is sufficient evidence to ensure organizational compliance with each of the elements listed in the grid below. Select "Met" if organization has validated its compliance, *or* select "Not Met" if the organization is not compliant. For any "Not Met" responses, a root cause analysis and resulting corrective action plan should be developed to bring organization into compliance.

1. Code of Conduct ("COC") and/or Compliance Policies  1.a Provided Code of Conduct (COC) and/or Compliance Policies to employees within 90 days of hire. (§50.1.3)  1.b Provided COC and/or Compliance Policies to employees annually and when updates are made. (§50.1.3)  2. Fraud Waste and Abuse (FWA) Training First Tier Entities may be "deemed" if enrolled into Parts A or B of the Medicare program or accredited as a supplier of Durable Medical Equip Prosthetics, Orthotics, and Supplies (DMFPOS). Any portion of the organization that is not deemed is still subject to the requirements. If deemed, the First Tier has automatically "Met" this element.  2.a New employees complete CMS" Combating Medicare Parts C and D Fraud, Waste, and Abuse Training module within 90 days of hire. (§ 50.3.2; or 2015 Final Rule CMS-4159-F published May 23, 2014)  2.b Existing employees complete CMS" Combating Medicare Parts C and D Fraud, Waste, and Abuse Training module annually. (§ 50.3.2; or 2015 Final Rule CMS-4159-F published May 23, 2014)  3. General Compliance Training  3.a New employees complete CMS" Medicare Parts C and D General Compliance Training module within 90 days of hire. (§ 50.3.1; or 2015 Final Rule CMS-4159-F published May 23, 2014)  3.b Existing employees complete CMS" Medicare Parts C and D General Compliance Training module annually. (§ 50.3.1; or 2015 Final Rule CMS-4159-F published May 23, 2014)  4. Exclusion List Screenings: Office of Inspector General List of Excluded Individuals and Entities ("OIG") and General Services Administration System for Award Management ("GSA")  4.a Screen employees against the OIG and GSA exclusion lists prior to hire. (§50.6.8)  5. Reporting Mechanisms  5.a Communicate reporting mechanisms, obligation to report, and non-retaliation policy for the reporting of non-compliance and potential FWA to employees. (§50.4.2)  5. b Report compliance concerns and potential FWA to employees. (§50.4.2)  6. Record Retention  6.a Retain training records of employees for ten (10) years which include	resulting corrective action plan should be developed to bring organization into compliance.			
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thereafter. (§50.6.8)				

Please refer to CHRISTUS Health Plan's Medicare Compliance Program FDR Guide for additional details for these requirements.