



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

**Objective:** To confirm an organization’s compliance with the Medicare Compliance Program requirements. The requirements are described in detail within the FDR Guide.

**Organization name:** \_\_\_\_\_

**Date completed:** \_\_\_\_\_

**Instructions:**

1. Review documentation and determine whether or not there is evidence to confirm the organization’s compliance with the listed requirements.
  - Under “Documentation reviewed,” list the materials reviewed and applicable sections or page numbers that show compliance.
  - Make notes in the section titled “comments.”
2. Determine whether or not the documentation reviewed supports compliance with the requirement.
  - Check “Met” if the documentation evidences compliance.
  - Check “Not Met” if the documentation does not evidence compliance with the requirements.
3. For any item listed as “Not Met,” complete a root cause analysis. Then develop a corrective action plan to address the root cause and bring your organization into compliance.

| Requirement   | Met                      | Not Met                  |
|---|--------------------------|--------------------------|
| <b>Code of Conduct (COC) and/or compliance policies</b>   |                          |                          |
| The terms “Employee” and “Downstream Entity” refer only to those FDR employees and Downstream Entities that support ATRIO’s Medicare business.  |                          |                          |
| FDR provided Code of Conduct (COC) and/or compliance policies to employees within 90 days of hire. (§ 50.1.3)<br><b>Documentation reviewed:</b> <i>e.g. Policy 101 – Employee Training (Section 2, page 3);</i><br><b>Comments:</b> <i>e.g. Employees get the code of conduct</i> | <input type="checkbox"/> | <input type="checkbox"/> |
| FDR provided COC and/or compliance policies to employees annually and when updates are made. (§ 50.1.3)<br><b>Documentation reviewed:</b><br><b>Comments:</b>   | <input type="checkbox"/> | <input type="checkbox"/> |
| <b>Record retention</b>   |                          |                          |
| FDR retains training records of their employees for ten (10) years including key data elements such as time, attendance, and topic, certificates of completion and test scores as applicable. (§ 50.3.2)<br><b>Documentation reviewed:</b><br><b>Comments:</b>                    | <input type="checkbox"/> | <input type="checkbox"/> |

| Requirement   | Met                      | Not Met                  |
|---|--------------------------|--------------------------|
| <p>The terms “Employee” and “Downstream Entity” refer only to those FDR employees and Downstream Entities that support ATRIO’s Medicare business.</p>   |                          |                          |
| <p><b>Exclusion list screenings: Office of Inspector General List of Excluded Individuals and Entities (OIG) and General Services Administration System for Award Management (GSA SAM)</b></p>  |                          |                          |
| <p>FDR screened employees against the OIG and GSA SAM exclusion lists prior to hire, validated any potential initial matches and did not utilize positively matched individuals for ATRIO Medicare products. (§ 50.6.8)</p> <p><b>Documentation reviewed:</b></p> <p><b>Comments:</b></p>   | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>FDR screens employees against the OIG and GSA SAM exclusion lists monthly, validated any potential matches and immediately removed any positively matched individuals from the ATRIO Medicare products. (§ 50.6.8)</p> <p><b>Documentation reviewed:</b></p> <p><b>Comments:</b></p>   | <input type="checkbox"/> | <input type="checkbox"/> |
| <p><b>Reporting mechanisms</b></p>  |                          |                          |
| <p>FDR has communicated to employees their reporting mechanisms, obligation to report and non-retaliation policy for the reporting of non-compliance and potential FWA. (§ 50.4.2)</p> <p><b>Documentation reviewed:</b></p> <p><b>Comments:</b></p>  | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>FDR reports compliance concerns and potential FWA that impact ATRIO’s Medicare products to ATRIO. (§ 50.4.2)</p> <p><b>Documentation reviewed:</b></p> <p><b>Comments:</b></p>   | <input type="checkbox"/> | <input type="checkbox"/> |
| <p><b>Downstream oversight</b></p> <p><input type="checkbox"/> <b>Not Applicable.</b> These requirements are not applicable if you have not contracted with any Downstream Entities OR do not use Downstream Entities for ATRIO’s Medicare products.</p>  |                          |                          |
| <p>FDR oversees the compliance of subcontractors (i.e., Downstream Entities) they use for ATRIO’s Medicare products which ensures (§ 50.6.6, § 50.7.2):</p> <ul style="list-style-type: none"> <li>• Downstream Entities are compliant with Medicare regulations and requirements such as the Medicare Compliance Program requirements as listed in above elements. [FDRs must make sure that their Downstream Entities have the necessary education and information to be compliant.];</li> <li>• Downstream Entities are meeting performance expectations; AND</li> <li>• Corrective actions for remediation of Downstream Entity deficiencies and disciplinary actions/ramifications (e.g., Downstream Entity contract term, etc.) for failure to satisfactorily remediate are enforced as appropriate.</li> </ul> <p><b>Documentation reviewed:</b></p> <p><b>Comments:</b></p> | <input type="checkbox"/> | <input type="checkbox"/> |

| <b>Requirement</b>   | <b>Met</b>               | <b>Not Met</b>           |
|--|--------------------------|--------------------------|
| <p>The terms “Employee” and “Downstream Entity” refer only to those FDR employees and Downstream Entities that support ATRIO’s Medicare business.</p> <p>FDR screens Downstream Entities against the OIG and GSA SAM exclusion lists prior to contracting, validated any potential matches and did not use or immediately removed any positively matched entities from the ATRIO Medicare products. (§ 50.6.8)</p> <p><b>Documentation reviewed:</b></p> <p><b>Comments:</b></p> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>FDR screens Downstream Entities against the OIG and GSA SAM exclusion lists monthly, validated any potential matches and did not use or immediately removed any positively matched entities from the ATRIO Medicare products. (§ 50.6.8)</p> <p><b>Documentation reviewed:</b></p> <p><b>Comments:</b></p>  | <input type="checkbox"/> | <input type="checkbox"/> |