

# Medicare Advantage compliance tips

**This checklist will help ensure you are compliant with the Medicare requirements for first tier, downstream, and related entities (FDRs). You must maintain documentation sufficient to demonstrate to us or Medicare that these elements are met.**

## Before hiring a new employee or governing body member

- Check both the Office of Inspector General (OIG) and General Services Administration (GSA) federal exclusion lists to ensure that no employees are excluded from participation in federal programs. The term “employees” includes temporary employees, volunteers and consultants. If applicable, establish a process to identify and prevent payment for claims at point-of-sale for any drugs or services prescribed, dispensed or delivered by excluded providers.
  - GSA exclusion list: [sam.gov](http://sam.gov)
  - OIG exclusion list: [oig.hhs.gov/exclusions](http://oig.hhs.gov/exclusions)

## Within 90 days of hire

- Provide Standards of Conduct and policies and procedures to all employees who provide administrative services or health care services for our Medicare business.
- Require governing body, officers and senior leadership (as applicable) to sign a conflict of interest disclosure.
- Provide Medicare parts C and D fraud, waste and abuse (FWA) training to all employees who provide administrative services or health care services for our Medicare business. *Note:* FDRs who have met the FWA certification requirements through enrollment into Parts A or B of the Medicare program or through accreditation as a supplier of DMEPOS are deemed to have met the FWA training and education requirements.
- Provide Medicare parts C and D General Compliance training to all employees who provide administrative services or health care services for our Medicare business.

## Monthly for all employees and governing body members

- Check both the OIG and GSA federal exclusion lists to ensure that no employees have become excluded from participation in federal programs.
  - GSA exclusion list: [sam.gov](http://sam.gov)
  - OIG exclusion list: [oig.hhs.gov/exclusions](http://oig.hhs.gov/exclusions)

## Annually for all employees and governing body members

- Provide Standards of Conduct and policies and procedures to all employees who provide administrative services or health care services for our Medicare business.
- Require governing body, officers and senior leadership (as applicable) to sign a conflict of interest disclosure.
- Provide Medicare parts C and D fraud, waste and abuse training and Medicare parts C and D General Compliance to all employees who provide administrative services or health care services for our Medicare business.

## Report all compliance concerns

For concerns regarding ethics, compliance or fraud, contact us through one of these confidential options:

- ▶ Fraud, waste and abuse:  
1 (800) 323-1693
- ▶ Anonymous reporting line:  
1 (888) 384-3577
- ▶ For questions or concerns related to Medicare compliance, privacy, HIPAA compliance or ethics: 1 (877) 878-2273

Visit our FDR resource page at [www.regence.com/fdr-resources](http://www.regence.com/fdr-resources).