



General Medicare Compliance Training

For First Tier, Downstream,
and Related Entities (FDRs)

Agenda

- Medicare Contractor Expectations
- What is an Effective Compliance Program?
- Presbyterian Health Plan Compliance Contact
- Code of Conduct
- Policies and Procedures
- Compliance and Fraud, Waste and Abuse (FWA) Training
- Open Lines of Communication
- Non-Retaliation
- Investigating FWA Reports
- Monitoring and Auditing
- Expectations for First Tier, Downstream and Related Entities (FDRs)



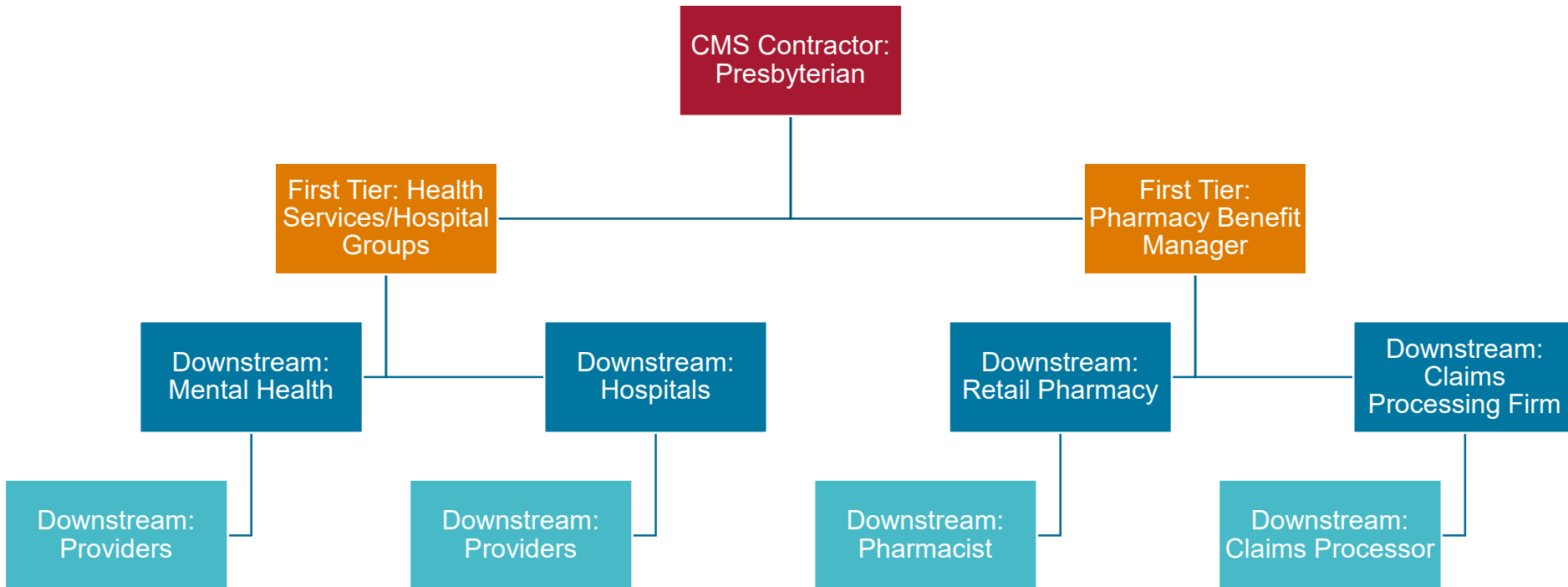
Medicare Contractor Expectations

CMS requires Medicare Advantage and Medicare Part D Plan sponsors, like Presbyterian Health Plan Inc. and Presbyterian Insurance Company, Inc. (Presbyterian), to distribute information about compliance and FWA expectations to contracted entities that perform administrative or health services on their behalf.

- These contracted entities are referred to as “First-Tier, Downstream, and Related Entities” or “FDRs” in the Medicare regulations.
- Your organization has been identified as an FDR of Presbyterian, and this training presentation is being provided to ensure compliance with Medicare expectations and regulations.



First Tier and Downstream Example



What is an Effective Compliance Program?

An effective compliance program is a set of activities that achieve the following.



Prevents and detects violations of law and company policy.



Encourages problems to be reported.



Provides mechanisms for internal monitoring and auditing.



Defines expectations for employees and business partners regarding ethical business conduct.



Demonstrates the organization's commitment to "doing the right thing."

Presbyterian Health Plan Compliance Contact

To report a compliance or FWA concern to Presbyterian, providers can call the Presbyterian Compliance Hotline at 1-888-435-4361 or they can contact:



Alejandra Quintana-Clyde, MHA, CHC, CHP
Compliance Officer



505-923-7496

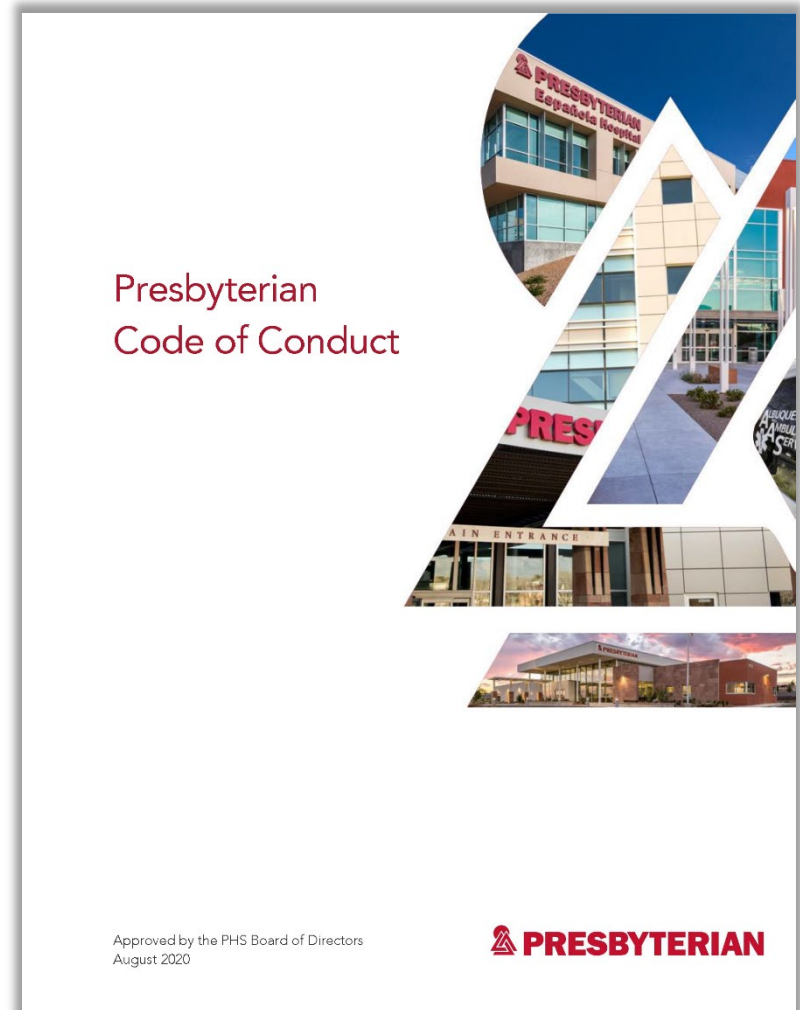


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Code of Conduct

- The Presbyterian Code of Conduct sets expectations for all employees, leadership, and governing body members to follow. These standards of conduct are guiding principles for how we conduct our business.
- FDRs who represent Presbyterian are also accountable for conducting themselves in accordance with our Code of Conduct when performing services for or on behalf of Presbyterian.
- A copy of the Presbyterian Code of Conduct is included with the training materials your organization received.



Policies and Procedures

- Presbyterian maintains policies and procedures related to its compliance program expectations. These policies are summarized in the compliance materials your organization received.
- Additional information about our policies and procedures is available by contacting the Presbyterian contract manager or the compliance officer.
- When new CMS regulations or guidance are issued, Presbyterian will work with your organization to communicate changes and implement any necessary changes to business processes.



Compliance and FWA Training

FDRs are responsible for training their workforce on FWA laws and Presbyterian's compliance expectations outlined in this slide presentation.



Open Lines of Communication

Open Door Policy

- Presbyterian strives to maintain an environment where all employees and contractors feel comfortable raising concerns.
- Our leadership is available to answer questions and help identify resources to help contractors understand organizational policies and regulatory requirements.

Compliance Hotline

- Anyone may leave an anonymous report on the Compliance Hotline at **1-888-435-4361**.
- All reports will be investigated.



Non-retaliation

- Presbyterian encourages any individual to report compliance concerns and violations, including any violation of law, company policy and procedures, or standard of conduct.
- Presbyterian has a strict non-retaliation policy for any report made in good faith.
- Anyone who retaliates against an employee or contractor for reporting a compliance concern or violation will be disciplined consistent with Presbyterian policy.



Investigating Compliance and FWA Reports



All reports of known or suspected compliance concerns and violations will be investigated.



Reports will be kept confidential to the extent possible.



Confirmed compliance violations will be resolved using corrective action plans.



When noncompliance by an FDR is confirmed, Presbyterian may take actions under the applicable contract terms, up to and including termination of contract.

Monitoring and Auditing



Presbyterian routinely assesses its business practices to identify high-risk areas and prioritize its monitoring and auditing efforts.



All contracts are subject to monitoring and auditing activities to identify and correct compliance issues.



FDRs may be asked to assist with monitoring and auditing efforts.



If non-compliance is detected, then a corrective action plan will be developed. FDRs are expected to cooperate with the corrective action plan.

Expectations for FDRs

- Be familiar with the Presbyterian Compliance Program.
- Know, understand, and abide by the Presbyterian Code of Conduct.
- Follow applicable Presbyterian policies and procedures.
- Train your workforce on Compliance and FWA requirements.
- Report any known or suspected compliance violations to Presbyterian timely.
- Assist and cooperate with Compliance Program activities when requested, including monitoring activities and corrective action plans.

