

Government Programs compliance tips

This checklist will help ensure you are compliant with the Government Programs requirements for first-tier, downstream and related entities (FDRs), and/or delegated and downstream entities (DDEs).

These requirements are applicable to all FDRs and DDEs who provide administrative or health care services for Regence's Medicare or Qualified Health Programs (QHP) business.

You are required to maintain documentation sufficient to demonstrate 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, governing body members 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](https://www.sam.gov)
- OIG exclusion list: oig.hhs.gov/exclusions

Within 90 days of hire

- Provide standards of conduct and compliance policies and procedures to all employees who provide administrative services or health care services for Regence's Medicare or QHP business.
- Require governing body members, officers and senior leadership (as applicable) to sign a conflict of interest disclosure.
- Provide fraud, waste and abuse (FWA) training to all employees who provide administrative services or health care services for Regence's Medicare and/or QHP business.
- Provide general compliance training to all employees who provide administrative services or health care services for Regence's Medicare and/or QHP 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**
 - OIG exclusion list: **oig.hhs.gov/exclusions**

Annually for all employees and governing body members

- Provide standards of conduct and compliance policies and procedures to all employees who provide administrative services or health care services for Regence's Medicare and/or QHP business.
- Require governing body members, officers and senior leadership (as applicable) to sign a conflict of interest disclosure.
- Provide FWA training and general compliance to all employees who provide administrative services or health care services for Regence's Medicare and/or QHP 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.