



First Tier, Downstream, or Related Entity (FDR) Compliance Attestation

FDR Name	FDR Address
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Email this attestation to compliance@cvpace.org OR fax to 209-724-6001 attention CV PACE Compliance Officer.

Central Valley PACE is committed to ensuring contracted partners considered FDR's under our PACE and Part D Health Plan are in compliance with Centers for Medicare and Medicaid Services (CMS) guidelines described within the Medicare Managed Care manual, Medicare PACE Manual, and Prescription Drug Benefit Manual for the services they provide on our behalf. A CMS approved training presentation can be accessed and downloaded from <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/Fraud-Abuse-MLN4649244.pdf>. By signing this attestation you are attesting to the following:

- FDR has an effective compliance program satisfying CMS requirements for preventing and detecting Fraud Waste and Abuse (FWA), Health Insurance Portability and Accountability (HIPAA) issues, and other compliance and non-compliance privacy and security issues.
- FDR has an effective exclusion screening program that screens employees and contractors against the OIG/SAM exclusion lists and similar Medicaid exclusion lists.
- FDR has a system for downstream entity monitoring and auditing.
- As of the date of this attestation, FDR staff engaged in work supporting Central Valley PACE health plan members have completed an initial or annual training program satisfying CMS requirements as required by 42 CFR 422.503 and 423.504 including the following:
 - Definitions of Fraud, Waste & Abuse;
 - Overview of laws and regulations pertaining to Fraud, Waste & Abuse, including a brief synopsis of the requirements, and criminal and civil penalties related to:
 - Federal and State False Claims Acts ;
 - Stark Law/ Anti-Kickback statute
 - HIPAA Privacy and Information Security Requirements.
 - Office of the Inspector General (OIG) Exclusion List (entities/individuals excluded from doing business with the Federal government);
 - Policies and procedures to address Fraud, Waste & Abuse;
 - Process for reporting suspected Fraud, Waste & Abuse to PACE Compliance;
 - Protections for persons who report suspected Fraud, Waste & Abuse
- FDR has a system whereby suspected misconduct, violations, FWA and privacy/security incidents can be reported that ensures anonymity and protects against retaliation. The system ensures a process of investigation and corrective action planning.
- FDR agrees to self-report to the CV PACE Compliance Officer any discovery of FWA, violation of HIPAA, PACE regulation 42 CFR Part 460, HITECH Act, or CMS regulation. Such discovery or violation may be reported by calling the anonymous Central Valley PACE and Golden Valley Health Centers Compliance Hotline **1-866-818-6185** or by emailing compliance@cvpace.org.
- FDR agrees to disclose conflicts of interest.
- FDR agrees to disclose separation of staff members that have access credentials to CV PACE systems and computers.
- FDR is in compliance with HIPAA Privacy and Security rules and any state regulations affecting services provided.
- FDR agrees to provide CV PACE with documentation supporting its attestation to any of the elements described within this document.

I have completed this attestation and have the authority to do so as of this effective date: _____

Signature	Printed Name	Title
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