

Staying in Touch with our Provider Network in 2020

Compliance is everyone's responsibility and it is Integrated Home Care's job to communicate this critical message to our FDRs. IHCS wants to ensure that all our providers are supporting our First Tier, Downstream and Related Entity (FDR) responsibilities to all our Health Plan Partners! The first step is being aware of both our general principles and values when it comes to conducting business as well as Medicare's Compliance Program.

"The Three Keys to FDR Compliance Success"



1. FDR Onboarding

Screen and document all new employees, office or field!

2. FDR Educating

Educate your staffers at a minimum of once a year or when there are significant program updates effecting your continued compliance with state and federal standards.

3. FDR Updating

Refresh your program throughout the year and screen monthly for exclusions. Sign a new FDR Attestation with IHCS each year.

While it is Integrated Home Care's responsibility to communicate compliance expectations to our FDR's, it is ultimately **you**, the providers, who fulfill these expectations and program compliance measures.

What do they consist of?

Basic program tenets such as having your own **Standards of Conduct**, performing **MONTHLY OIG/GSA** exclusion screening on all employees (including owners) and having a strong set of Policies, Procedures and Tutorials on combatting **Fraud, Waste and Abuse** to share with all your agency employees at a minimum of once a year.

Don't have your own crafted Conduct Standards or FWA Policies?

IHCS will share their professionally prepared Code of Conduct, FWA P&P's and any other tutorials you may need to be in compliance with Medicare, Medicaid and Health Plan contractual requirements.

IHCS's Monitoring Expectations of our Downstream Entities for 2020

Integrated is responsible for the lawful compliance administration of the Medicare Part C and D benefits under our contract with a health plan, regardless of whether IHCS has delegated any functions to FDRs. With that said, we then must also must comply with the very same standards we ask of you. The Health Plan audits IHCS and we in turn audit each agency we contract with periodically to ensure compliance.

- ✓ IHCS is required to **monitor compliance** of the entities with which they contract to support Anthem Medicare Business.
- ✓ IHCS is required to **provide evidence** of having a procedure for monitoring downstream entities on a regular basis.
- ✓ **Your Agency** is known as a "**downstream**" entity of IHCS.
- ✓ **Your Agency** is required to provide IHCS **supporting evidence** of compliance with all CMS requirements.

**Questions? Please send your Provider Relations Rep an email!
Kindly sign your 2020 FDR Attestation and return it to us today!**

Integrated Home Care Services, Inc. enforces a strict policy of non-retaliation. Retaliation against anyone who reports compliance issues in good faith is strictly prohibited, including reports made by contracted vendors (FDRs). If you see retaliation or believe it has occurred, you must report it.