REGENCE is comprised of companies including Regence BlueShield of Idaho, Regence BlueCross BlueShield of Oregon, Regence BlueShield, Regence BlueCross BlueShield of Utah, all of whom offer Medicare Advantage and Part D Prescription Drug Plans.

This document outlines the plan’s policy and procedure needed to comply with the following:

- Prescription Drug Benefit Manual, Chapter 9, 50.6.6
- Medicare Managed Care Manual, Chapter 21, 50.6.6

POLICY
Regence contracts with the Centers for Medicare & Medicaid Services (CMS) to provide health care services to Medicare through our Medicare Advantage Plans and Medicare Part D prescription drug products. A condition of our contract requires that we monitor a sample of contracted FDRs for program compliance. Regence fulfills this responsibility by requiring a number of medium-risk and high-risk FDRs to complete an annual compliance attestation and offshore disclosure. The completed attestation and offshore disclosure is reviewed to identify areas of compliance risk that require remediation.

PROCEDURE
As part of ongoing FDR compliance monitoring, medium-risk and high-risk FDRs are identified at contracting and are required to complete a compliance attestation and offshore disclosure form.

As part of the annual FDR compliance risk-assessment, a sample of medium-risk and high-risk FDRs is identified for yearly compliance monitoring.

Medium-risk and high-risk FDRs are defined as:

- Sample of delegated credentialing entities
- All vendors that meet criteria outlined in risk assessment

The Medicare Compliance Analyst is responsible for mailing to sample of delegated credentialing entities and FDR vendors.

The Medicare Compliance Analyst follows up with sample group by phone and email to ensure attestations and offshore disclosures are completed and returned within 30 days.
If attestations and offshore disclosures are not returned in a timely manner the matter will be escalated to additional review with appropriate internal personnel.

Alternate method of sending attestation

The Medicare Compliance Analyst completes the following alternate steps to request the compliance attestation and offshore disclosure from the sample group:

a. Obtains email addresses for all medium-risk and high-risk FDRs selected to complete the compliance attestation and offshore disclosure.

b. Compiles private distribution list and sends letter & copy of attestation and offshore disclosure.

c. Follows up with sample group by phone and email to ensure attestations and offshore disclosures are completed and returned within 30 days.

If attestations and offshore disclosures are not returned in a timely manner the matter will be escalated to additional review with appropriate internal personnel.

The schedule for mailing attestations and offshore disclosures is determined based on anticipated workflow for the year.

Tracking System

The Medicare Compliance Analyst tracks receipt and status of each compliance attestation and offshore disclosure from the sample group.

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Annual Review/Revision

April 2016
March 2017