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 we provide compliance oversight for first-tier, downstream and related entities (FDRs). The Medicare Compliance Analyst will ensure through annual attestation monitoring of a sample of medium-risk and annual auditing of high-risk FDRs that conflict of interest disclosure is completed.

**PROCEDURE**

The Medicare Compliance Analyst ensures a conflict of interest statement, attestation, or certification is signed at the time of contracting and annually thereafter by:

- FDR governing body, officers, and senior leadership (as applicable) responsible for administration or health care services for or to Medicare members

Regence offers a sample conflict of interest disclosure on the FDR resources website and will accept all standard corporate conflict of interest disclosures. Standard conflict of disclosure language meets CMS’s guidelines as all business, including Medicare business, is included in the disclosure.

**Annual Review/Revision**

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