



## Evidence Examples

The table below provides a list of examples to demonstrate fulfillment with CMS compliance requirements. It is not aimed to be all inclusive and is not a list of all the items required.

Summary of Requirement	Examples of Evidence
<p><b>CMS General compliance and Fraud, Waste and Abuse (FWA) Training:</b> FDR employees and downstream entities completed CMS training within 90 days of hire/contracting and annually thereafter</p>	<ul style="list-style-type: none"> <li>• Organization provide an attestation showing proof of employee and downstream entity completion</li> <li>• Employee attestations confirming proof of completion</li> <li>• Sign in sheets, training logs, copies of certificate of completion of CMS training modules</li> <li>• Proof of deemed status</li> <li>• Policy and procedure</li> </ul>
<p><b>Code of Conduct and compliance policies:</b> FDR employees and downstream entities received Senior Preferred’s Code of Conduct or comparable Code of Conduct (COC) upon hire/initial contracting, and annually thereafter</p>	<ul style="list-style-type: none"> <li>• Organization attestation showing employee of and downstream entity completion</li> <li>• Employee attestations confirming proof of completion</li> <li>• Sign in sheets and training logs for COC training</li> <li>• Participation in onboarding/FDR Guide/orientation manuals</li> <li>• Policy and procedure</li> </ul>
<p><b>Record Retention:</b> FDR keeps records related to Senior Preferred Medicare Advantage product service delivery and activities for a period of 10 years</p>	<ul style="list-style-type: none"> <li>• Organization attestation showing proof of retention</li> <li>• Record retention policy and procedure</li> <li>• Downstream entity contractual provision</li> <li>• Training content distributed to employees and downstream entities</li> </ul>
<p><b>Reporting Mechanisms:</b> FDR employees and downstream entities received reporting mechanisms for reporting potential or actual noncompliance and/or FWA either internally then to Senior Preferred or to Senior Preferred directly. This includes nonretaliation policy for good faith reporting.</p>	<ul style="list-style-type: none"> <li>• Reporting mechanism posters posted throughout organization</li> <li>• Organizations attestation showing proof of distribution of reporting options</li> <li>• Code of Conduct training content with training sign in sheets/logs, employee attestations, etc.</li> <li>• Policy and procedure on reporting mechanisms</li> <li>• Downstream entity contractual provision</li> </ul>
<p><b>Exclusion lists screenings:</b> FDRs check OIG and GSA Lists for employees and downstream entities prior to hire/contracting, and monthly thereafter</p>	<ul style="list-style-type: none"> <li>• OIG or GSA website screenshots of list check</li> <li>• Automated results from acquired tools (e.g. Bridger, Verify Comply)</li> <li>• Policy and procedure on how exclusion list screenings are checked</li> <li>• Attestation from individual within the organization that conducts the checks (e.g. Human Resources)</li> <li>• Downstream entity contractual provision</li> </ul>
<p><b>Downstream entity oversight:</b> FDRs conduct sufficient oversight of their downstream entities’ CMS compliance</p>	<ul style="list-style-type: none"> <li>• Attestation from downstream entities to monitor compliance with Medicare compliance program requirements.</li> <li>• Audit reports with review results</li> <li>• Monitoring of entity functions with results</li> <li>• Policy and procedure on downstream entity oversight</li> </ul>