



Examples of Evidence for Fulfillment of CMS Compliance Program Requirements

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

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