



2019 Vantage Medicare Compliance Program Guidelines Attestation

This attestation confirms your organization reviewed Vantage Health Plan's ("Vantage") *First Tier, Downstream, and Related Entities ("FDR") Medicare Compliance Program Guide* which can be found on Vantage's web page at <https://vantagehealthplan.com>. It also confirms your commitment to comply with Vantage's requirements. These requirements are listed below and apply to all services your organization, as Vantage's FDR, provides for Vantage Medicare business. The requirements also apply to any of the Downstream Entities you use for Vantage Medicare business. Accordingly, on behalf of my organization, I hereby attest to the following:

1. General Compliance Training

My organization's employees completed Medicare Parts C&D General Compliance Training within 90 days of hire and annually thereafter. The training was completed on the Medicare Learning Network (MLN) or our existing training materials/systems.

2. Fraud, Waste, and Abuse ("FWA") Training

My organization's employees completed Medicare Parts C&D Fraud, Waste, and Abuse Training within 90 days of hire and annually thereafter. The training was completed on the Medicare Learning Network (MLN) or our existing training materials/systems.

3. Code of Conduct and/or Program Policy Distribution

My organization has adopted either Vantage's or a comparable Code of Conduct and/or compliance policies which were distributed to all employees within 90 days of hire, upon revision, and annually thereafter.

4. Office of Inspector General (OIG) and General Services Administration System for Award Management (SAM) Exclusion List Screening

My organization screens the OIG and SAM exclusion lists prior to hire or contracting, and monthly thereafter, for all our employees and Downstream Entities. My organization removes any person/entity from work on Vantage Medicare business if found on these lists.

5. Reporting of FWA and Compliance Violations

My organization communicated to employees how to report suspected or detected non-compliance or potential FWA, and that it is their obligation to report without fear of retaliation or intimidation against anyone who reports in good faith. My organization either requests employees report concerns directly to Vantage or maintains confidential and anonymous mechanisms for employees to report internally. In turn, we report these concerns to Vantage when applicable.

