

**Instructions:** Please check the box next to the corresponding Medicare Shared Savings Program requirement to attest to your compliance:

- General Compliance Policies and Procedures that address code of conduct and fraud, waste, and abuse laws and regulations.
- Annual General Compliance Education for all employees and Business Associates.
- Use of a Reporting Hotline to anonymously report suspected or known violations.
- Conduct annual billing, coding and documentation audits to identify areas of risk for mitigation.
- Screen all employees for “Exclusion” on the OIG Cumulative Sanction Report prior to an offer of employment and periodically thereafter.
- Screen all employees for criminal background prior to an offer of employment and periodically thereafter.
- Maintain documentation that all Business Associates and their employees have been screened for criminal background and “Exclusion” on the OIG Cumulative Sanction Report at a minimum of once per year.
- Utilize a HIPAA Business Associate Agreement for vendors and contractors who provided services to MSSP beneficiaries.
- Document that all Business Associates meet the network’s liability insurance requirements with limits of at least \$1,000,000 per occurrence and \$3,000,000 aggregate.
- Obtain a signed Confidentiality Agreement from all employees, which is maintained in their personnel file.
- Prohibit ACO Participants, ACO providers/suppliers, or other individuals or entities performing functions or services related to CHN activities from offering gifts or remuneration to Beneficiaries as an inducement for receiving items or services from the ACO or to remain in the ACO.
- Use only Medicare Shared Savings Program marketing materials that have been approved by CHN and the Center for Medicare and Medicaid Services.