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| Department: COMPLIANCE | Version #: 2 |
| Title: Regulatory Guidance Review and Distribution | |
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| Document Type: Policy | Approver(s): Policy Review Committee |
| References: Medicare Managed Care Manual, Chapter 21, Section 50.4.1: Prescription Drug Benefit Manual, Chapter 9, Section 50.4.1. | Date Approved: 3/14/2020 |

**Printed copies are for reference only. Please refer to
S/Policies and Work Instructions for the most recent version.**

Purpose: To ensure that ATRIO Health Plans' (ATRIO's) Compliance Department follows requirements related to effective communication of laws, regulations, and guidance to others.

Policy: The ATRIO Compliance Department ensures effective communication of laws, regulations, and sub-regulatory guidance to appropriate parties within ATRIO or ATRIO's First Tier, Downstream and Related Entities.

Scope: This policy applies to all ATRIO Departments and FDRs.

Definitions:

CMS - The Centers for Medicare & Medicaid Services. This is the agency within the Department of Health and Human Services (HHS) that is responsible for directing the Medicare program.

FDR - First Tier, Downstream and Related Entities.

- a) **First Tier Entity:** Any party that enters into a written arrangement, acceptable to CMS, with ATRIO to provide administrative services or health care services to an enrollee in ATRIO's Medicare Advantage plans.
- b) **Downstream Entity:** Any party that enters into a written arrangement, acceptable to CMS, with persons or entities involved with the MA benefit or Part D benefit, below the level of the arrangement between ATRIO and a First Tier Entity. These written arrangements continue down to the level of the ultimate provider of both health and administrative services.
- c) **Related Entity:** Any entity that is related to ATRIO by common ownership or control and:
 - i. performs some of ATRIO's management functions under contract or delegation;
 - ii. furnishes services to Medicare enrollees under an oral or written agreement; or
 - iii. leases real property or sells materials to ATRIO at a cost of more than \$2,500 during a contract period

HPMS - Health Plan Management System. This is the CMS web-enabled system that serves a critical role in the ongoing operations of ATRIO's Medicare Advantage and Dual Special Needs Plan by, among other things, distributing memos from CMS about guidance changes.

Policy:

The Compliance Department follows CMS guidelines for effective communication from the compliance officer to others. This information includes laws, regulations, and guidance for sponsors and FDRs such as statutory, regulatory, and sub-regulatory changes (e.g., HPMS memos).

Methods to communicate this information include e-mail distributions, individual and group meetings. This information is disseminated within a reasonable time to all appropriate parties.

Resources:

S:\COMPLIANCE\Regulatory Communications