



Greater Covina Medical Group, Inc.

FDR Compliance Attestation 2019

(First Tier, Downstream and Related Entities (FDR), please complete, sign, and return this Attestation)

FDR/Provider Name: _____
Street Address: _____
City, State Zip: _____, _____

In recognition of FDR's status and role as a covered entity, contracted with Greater Covina Medical Group, Inc. ("HPN"), FDR attests to the following statements:

FDR has in place an effective compliance program, meeting CMS standards to detect, prevent, and report instances of Fraud, Waste, and Abuse ("FWA"), other non-compliance, or Health Insurance Portability and Accountability Act ("HIPAA") Privacy or Security issues;

FDR screens all employees, officers, and vendors against the OIG/GSA Excluded Persons Lists prior to hire/contract, and monthly thereafter;

FDR and all staff engaged with treatment, administration, or support of CMS members, have completed all required initial new hire and annual trainings as follows:

- a. FDR and staff have completed the required CMS annual FWA training* on (or before): _____/2019 (*as required by 42 CFR 422.503 and 423.504); and
- b. FDR and staff have completed the CMS annual Medicare Compliance training*, including Code of Conduct training, on (or before): _____/2019 (*as required by 42 CFR 422.503 and 423.504).
- c. FDR and staff have completed HIPAA training on (or before): _____/2019.
- d. FDR and staff have completed the Model of Care (MOC) training on (or before): _____/2019 (only applicable to persons directly involved with patient care).
- e. FDR and staff have completed Cultural and Linguistics training on (or before): _____/2019.

FDR agrees to notify HPN's Compliance Officer immediately upon discovery of any FWA, non-compliance, or suspected violation of the HIPAA, HITECH Act, Medicare Advantage, CMS regulations, or any other statute, regulation, and/or policy and procedure; and may do so by calling the Corporate Compliance Hotline at 855-682-4127 or emailing corporatecompliance@heritagemed.com.

FDR agrees to immediately disclose to HPN's Compliance Officer any actual or potential conflicts of interests, as outlined in HPN's Code of Conduct, should any arise.

FDR agrees to contact HPN's Compliance Officer or Provider Relations when a staff member is no longer employed with FDR to ensure logon access to HPN networks/systems is appropriately disabled.

FDR understands that any privacy incident involving any Medi-Cal or Medicaid patient requires notice to HPN and the California Department of Health Services within 1 business day from discovery.

FDR understands that, upon HPN's request, it agrees to provide HPN's Compliance Officer with documentation to substantiate its screening, training, and/or compliance and privacy program activities.

By completing the portion below, I have verified the above and certify it as true and accurate, as of today:

FDR Entity/Provider NPI: _____ **Signature** _____ **Date** _____

Person completing form: _____ **Title:** _____

[] (If Applicable) Please attach a roster of your credentialed staff members or contracted individual providers, for whom you are attesting on behalf of (Only include those Providers with NPI numbers!).



Greater Covina Medical Group, Inc.

FDR Compliance Attestation

Roster of Credentialed Staff Members or Contracted Individual Providers with NPI numbers, for whom the attached FDR Compliance Attestation is attesting on behalf of:

#	Credentialed Provider/Staff (Last Name, First Name)	NPI
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#	Credentialed Provider/Staff (Last Name, First Name)	NPI
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FDR Entity/Provider Name: _____

Signature _____

Date _____

Roster Verified By: _____

Title: _____