



Department: COMPLIANCE	Version #: 4
Title: Compliance Program and Compliance Policies Distribution	
Process Owner: Compliance Officer	Date Created: 12/7/2018 Reviewed: 7/10/2023
Document Type: Policy	Approver: Policy Review Committee
References: CMS Medicare Managed Care Manual, Chapter 21 , Section 50.1.3 42 C.F.R. §§ 422.503(b)(4)(vi)(A), 423.504(b)(4)(vi)(A)	Date Approved: 9/28/2021

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

Purpose: The purpose of this policy is to document ATRIO’s compliance with CMS requirements for distribution of the Compliance Program and compliance policies to ATRIO Employees, Board of Directors, and First Tier Downstream Related Entities (FDRs).

Summary: The Compliance Program and Compliance Policies are distributed upon hire and annually thereafter.

Scope: This document applies to the Compliance Department.

Definitions:

ATRIO Employee(s): any full-time employees, part-time employees, temporary employees, and volunteers employed by ATRIO or Atrio Holding Company, and Independent contractors.

Board of Directors: the group of individuals elected by the shareholders to manage and control the business and affairs of ATRIO.

Compliance Policies: any official ATRIO policies listed under the Compliance Department, which includes ATRIO’s Code of Conduct.

FDR: First Tier, Downstream, and Related Entity.

- 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.

Material Change: means a substantive change to the scope, definitions, or policy section of a policy.

Policy:

ATRIO Employees

ATRIO distributes the Compliance Program and the Compliance Policies to ATRIO Employees within 90 days of date of hire, when there is a Material Change to the policies, and annually thereafter.

Board of Directors

ATRIO distributes the Code of Conduct, the Conflict of Interest policy, and Compliance Program to members of the Board of Directors within 90 days of appointment and annually thereafter.

First Tier Downstream Related Entities (FDR)

ATRIO will distribute the Compliance Program and applicable Compliance Policies to FDRs within 90 days of initial contracting and at least annually thereafter.

ATRIO requires its FDRs to distribute either of the following to their employees: (a) ATRIO's Compliance Program and Compliance Policies; or (b) the FDR's own comparable Compliance Program and Compliance Policies. FDRs are required to attest to such distribution annually and may be audited to ensure compliance with this requirement.

Documentation:

ATRIO maintains a method to demonstrate that the Compliance Program and Compliance policies are distributed to Employees, members of the Board of Directors, and FDRs as indicated above.

Resources:

Training & Policy Distribution Tracker - S:\COMPLIANCE_DEPT\Staff Compliance Requirements\Mandatory Training_Policy Distribution

S:\POLICIES_AND_WORK_INSTRUCTIONS\1-Official Policies - Approved

