

**2022: SummaCare Delegated Entity
Requirements Attestation**

Organization Name:

NPI or Tax ID Number:

Street Address:

City, State & Zip Code:

Contract/Business Agreement Start Date:

PLEASE NOTE: If your organization's answer to any of the questions below is "No" and/or if you believe a question is not applicable to your organization, please answer "No", to that question, and provide a written explanation along with this completed form.

Please note that the below items are not an exhaustive list of your obligations. This list also does not replace the existing regulatory requirements that SummaCare's employees, partners, and vendors are required to comply with in carrying out their duties and responsibilities.

SummaCare's Delegated Entities have a responsibility to report compliance, fraud, waste, and/or abuse issues involving SummaCare. You may confidentially report any potential violations of our compliance policies or any other applicable regulations/requirements. Please refer to the attached "Reporting Ethics & Compliance Concerns" flyer for details and contact information. We expect you to share this flyer with those who work on the SummaCare account.

This form must be completed by an authorized representative of your organization. An authorized representative is an individual who has responsibility, directly or indirectly, for all employees, contracted personnel, providers/practitioners, and vendors who provide health care or administrative services. Authorized representatives may include but are not limited to your Human Resources Director, Compliance Officer, Chief Medical Officer, Practice Manager/Administrator, Provider, Executive Officer, or similar related positions.

1A Code of Conduct (NOTE: Please answer question 1A OR 1B.)

#1A	YES
Answer	NO

The organization attests that it complies with the SMSO Code of Ethical Conduct and all other applicable policies and procedures. (The organization attests to the review of the SMSO Code of Ethical Conduct and applicable policies/procedures at least annually and then as needed for updates and/or additions.) NOTE: To view/download these documents, please [CLICK HERE](#).

1B Code of Conduct (NOTE: Please answer question 1B OR 1A.)

#1B
Answer YES
NO

The organization attests that it complies with its own Standards of Ethical Conduct and policies and procedures that meet all applicable delegated entity requirements. (The organization attests to the review of its own Standards of Ethical Conduct and policies/procedures at least annually and as needed for updates and/or additions.)

2 Compliance Program

#2
Answer YES
NO

The organization attests that it has a Compliance Program in place that includes well-publicized and enforced disciplinary standards, well-publicized methods for how employees may report suspected program noncompliance or Fraud, Waste and Abuse (FWA), and a non-retaliation policy for good faith reporting.

3 Required Monthly Screenings

#3
Answer YES
NO

The organization attests that it (or a vendor of their choice) performs monthly screenings to ensure that all SummaCare-supporting employees are not excluded from participation in Federally-funded health care programs according to the Department of Health and Human Services, Officer of Inspector General (OIG), and the U.S. General Services Administration (GSA). The organization also attests that it keeps (and can produce upon request) results reports from these monthly screenings. And, the organization attests that employees found to be excluded are removed from SummaCare-supporting tasks and SummaCare Compliance is notified immediately.

4 Compliance with Applicable Regulations

The organization attests to compliance with all applicable standards of the **Code of Federal Regulations**, including Title 45, Section 156.340 (Standards for downstream and delegated entities.) And, the organization attests that its policies and procedures are in compliance with the standards of §§ 156.705 (Maintenance of records for Federally-facilitated Exchanges) and 156.715 (Compliance reviews of QHP issuers in Federally-facilitated Exchanges) in the **Code of Federal Regulations**.

#4
Answer

YES
NO

5 Disaster Recovery Plan

The organization attests to having a Business Continuity program in place to address extended business disruptions. The organization's plan is such that key personnel, resources, services and actions required to maintain critical business processes and operations are covered. (The organization can provide copies of its Business Continuity and/or Disaster Recovery plans to SummaCare upon request.)

#5
Answer

YES
NO

6 Offshore Subcontractor Attestation

Is your company/organization located in an offshore country (outside of the United States or U.S. Territories) **OR** do you contract with offshore subcontractors for services? **If "yes" - please complete the "SummaCare Offshore Attestation" document and return it along with this form.**

#6
Answer

YES
NO

7 Policies & Procedures

As stated within the questions above, SummaCare's delegated entities should maintain and enforce a Code of Conduct as well as disciplinary standards that describe the ways employees may report instances of non-compliance and/or FWA. The display and/or distribution of our attached ***Reporting Ethics & Compliance Concerns*** flyer supports your organization's overall compliance. Please briefly describe below where your organization's Code of Conduct and other related policies/procedures are housed (Intranet site, shared folder, etc.) and how you will share the attached SummaCare flyer.

#7 Answer:

Confirmation of Vendor Attestation

By clicking the box below, this organization attests to the accuracy of all of the answers provided herein, and affirms that our organization will furnish documentation or other related information upon SummaCare's request to validate our ongoing compliance with the regulations cited in this attestation.

Today's Date:

Yes, this organization is in compliance with the items described herein.

Please return this completed form to: pachecos@summacare.com.



Reporting Ethics & Compliance Concerns



SummaCare's Delegated Entities have a responsibility to report any alleged compliance, fraud, waste and/or abuse issues involving SummaCare. SummaCare Delegated Entities may confidentially report a potential violation of our compliance policies or any applicable regulation by utilizing any of the methods indicated below.

As a SummaCare Delegated Entity, your organization must adopt and enforce a zero-tolerance policy for retaliation or retribution against anyone who reports suspected misconduct. For your reference, SummaCare policy prohibits retaliation or harassment against anyone who raises a concern or reports an issue to the SummaCare Compliance Officer.

What to Report

- Any compliance concern, including suspected or actual misconduct
- Violations of SummaCare's Code of Ethical Conduct - visit www.summacare.com/compliance/policy-review to download a copy of SummaCare's Code of Ethical Conduct.
- Violations related to Protected Health Information (PHI) and/or Health Insurance Portability and Accountability Act (HIPAA) laws and regulations
- Fraud, waste or abuse concerns, including inaccurate billing, eligibility, enrollment and membership concerns
- Conflict of interest issues

Ways to report - all methods of reporting are confidential

SummaCare Compliance Hotline (24/7)	330-996-8821 or 800-361-3908
Mail	SummaCare Compliance Officer PO Box 3620 Akron, OH 44309-3620
Email	compliance@summacare.com
Online	www.summacare.com/compliance/reporting and submit the confidential form