

### FDR Newsletter

QUARTER 4 | DECEMBER 2020

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#### **QUICK LINKS**

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The Banner – University Health
Plans Compliance Program is
committed to compliance and
meeting requirements of all
applicable laws and regulations of
CMS and AHCCCS.



#### IN THE NEWS

#### Thank You!

The B – UHP team would like to take this opportunity to once again thank all our FDRs, vendors, partners, providers and their employees for all that you've done and continue to do to serve our members. Your partnership through these unprecedented times is greatly appreciated. We wish each of you and your families a healthy and happy holiday!

Referring, Ordering, Prescribing, Attending (ROPA) Providers Required to Registered with AHCCCS

Considering COVID-19 public health emergency, AHCCCS has extended the ROPA registration deadline to June 1, 2021.

Beginning June 1, 2021 all health care providers who refer AHCCCS members for an item or service, who order non-physician services for members, who prescribe medications to members, and who attend/certify medical necessity for services and/or who take primary responsibility for members' medical care must be registered as AHCCCS providers.

#### **COMPLIANCE UPDATES**

#### FDR Responsibilities in Sanction Screening

Federal payment may not be made for items or services furnished or prescribed by a provider or entity that is excluded from participation in federal programs. B-UHP is responsible for ensuring that we do not use federal funds to pay for services, equipment, or drugs prescribed or provided by a provider, supplier, employee, or FDR excluded by the Office of Inspector General (OIG), General Services Administration (GSA), or CMS.

As a first-tier, downstream, or related entity that provides administrative or health care services to Medicare beneficiaries, your organization is required to review the OIG List of Excluded Individuals and Entities (LEIE), the GSA System for Award Management (SAM), and the CMS Preclusion List (Provided to by the Vendor Oversight Team). These checks must be performed prior to the hiring or contracting of any new employee, temporary employee, volunteer, consultant, governing body member, or delegated vendor. After entities are initially screened against the sanction lists at the time of hire or contracting to ensure that none of these persons or entities are excluded/precluded, you must continue to review the LEIE, SAM, and CMS Preclusion lists monthly (Provided by B-UHP) for any newly excluded/precluded individuals or entities which have been added to the lists.

Additionally, FDRs are required to maintain evidence they have checked these sanction lists. If any of your employees or Downstream Entities is on one of these sanction lists, you must immediately take action to remove them from work directly or indirectly related to B-UHP's plans and notify us right away.

#### How to Report Exclusion/Screening Findings:

You can report any excluded or precluded individual/entity to the Compliance Department via the following methods:

- Email: BHPCompliance@bannerhealth.com
- Secure Fax: 520-874-7072
- Mail: 2701 E. Elvira Rd. Attn: BHP Compliance Dept., Tucson, AZ 85756
- Contact the Medicaid Compliance Officer, Terri Dorazio, via cell phone 520-548-7862 or email <a href="mailto:Theresa.Dorazio@bannerhealth.com">Theresa.Dorazio@bannerhealth.com</a>
- Contact the Medicare Compliance Officer, Linda Steward, via cell phone 520-403-3780 or email <u>Linda.Steward@bannerhealth.com</u>

## You Can More Information about the sanction lists at:

Office of Inspector General (OIG) List of Excluded Individuals and Entities (LEIE): https://exclusions.oig.hhs.gov/

General Services Administration (GSA) System for Award Management (SAM): https://www.sam.gov/SAM/

CMS Preclusion List:
https://www.cms.gov/Medicare/
Provider-Enrollment-andCertification/Preclusion-List
(This list is provided monthly by the BUHP Vendor Oversight Team)

#### REPORT ACTUAL OR POTENTIAL FWA, OR NON-COMPLIANCE

# ComplyLine: 1-888-747-7989 (Reports can be made anonymously 24/7) Secure Fax: (520) 874-7072 U.S. Mail: Banner – University Health Plans Compliance and Audit Department 2701 E. Elvira | Tucson, AZ 85756 Email: BUHPCompliance@bannerhealth.com

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