

From: Beth Socoski [<mailto:bsocoski@gatewayhealthplan.com>] **On Behalf Of** Medicare Compliance Officer
Sent: Friday, December 04, 2015 8:07 AM
To: FDRCommunications

Subject: Requirement - Review DHHS OIG & GSA List - Gateway Health FDR Communication - 2015 Volume 11 (November)

Hello,

The Centers for Medicare & Medicaid Services (CMS) requires Gateway HealthSM (Gateway) to “establish and implement effective lines of communication, ensuring confidentiality between the compliance officer, members of the compliance committee, the sponsor’s employees, managers and governing body, and the sponsor’s First-tier, Downstream, and Related entities (FDRs).

Per CMS guidance in the Medicare Prescription Drug Benefit Manual and the Medicare Managed Care Manual, Chapters 9 & 21, Section 50.6.8 respectively, “Medicare payment may not be made for items or services furnished or prescribed by an excluded provider or entity. Sponsors shall not use federal funds to pay for services, equipment or drugs prescribed or provided by a provider, supplier, employee or FDR excluded by the DHHS OIG or GSA.”

Gateway reviews the Department of Health & Human Services (DHHS) Office of Inspector General (OIG) List of Excluded Individuals and Entities (LEIE list) and the GSA Excluded Parties Lists System (EPLS) prior to contracting with new FDR, and monthly thereafter, to ensure that entities are not excluded or become excluded from participation in federal programs.

As part of our continued commitment to delegation oversight, FDR's contracted with Gateway are required to check LEIE & EPLS list for employees and downstream entities prior to hire and at least monthly thereafter to confirm and ensure employees and downstream entities are not excluded or become excluded from participation in federal programs.

To learn more about the OIG/GSA exclusions or use the free searchable online database, visit their site here: <http://oig.hhs.gov/exclusions/index.asp>.

You received this email from

MedicareComplianceOfficer@GatewayHealthPlan.com because CMS requires ongoing communication between Gateway Health's Medicare Compliance Officer and FDRs to raise awareness of potential compliance issues and risks to organizations. This is the **eleventh communication** sent this year. Please share this communication with your staff and downstream entities.

Gateway Health is committed to achieving compliance with CMS rules and regulations. Thank you for supporting Gateway Health's Medicare Compliance Initiatives!

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