



Policy Title: Downline Oversight & Monitoring

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Accountable Dept: Compliance

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Policy: Downline Oversight & Monitoring

Scope: All downline entities with contracted relationships with GarityAdvantage Agencies are subject to the following oversight and monitoring.

Policy and Procedure Statement: As a Field Marketing Organization operating in the Medicare Markets, GarityAdvantage Agencies is required to perform certain oversight and monitoring in order to remain in compliance with our Carrier partners. The following processes are required to be performed on an ongoing basis.

GarityAdvantage will post a copy of our Standards of Conduct and Compliance Policy for all contracted downline entities.

GarityAdvantage requires that all contracted downline entities screen against the Office of the Inspector General (OIG) database and the System for Award Management (SAM) suspension and debarment databases to ensure the prospective employees are eligible for hire. In addition we advise that on a monthly basis, all employee's names will be checked against the (OIG) database and the (SAM) database to ensure that each employee remains eligible to participate in working with Medicare programs. Screen shots of these look-ups need to be stored electronically. Employees found to be barred from participating with Medicare programs will be terminated from their employment with contracted downline entity. Employees who are licensed, contracted, and certified to sell Medicare Advantage or Medicare Prescription Drug products are exempt since these screenings are done for contracted agents by the carriers themselves.

GarityAdvantage requires that all contracted downline entities perform Fraud, Waste and Abuse training for their non-contracted employees within 90 days of hire and annually thereafter.

GarityAdvantage requires that all contracted downline entities retain their CMS documentation (including Scope of Appointment and application) for a minimum of ten (10) years.

GarityAdvantage requires that all contracted downline entities inform GarityAdvantage whether or not they contract with any off-shore entities to support their contracted work.

GarityAdvantage has created a web portal that provides compliance requirements, policies, and CMS updates for our downstream entities. (www.garityadvantage.com) Garity directs their downstream entities to review and complete the compliance requirements and monitors their completion.

Responsibility for implementing this policy rests with the GarityAdvantage Compliance Committee.

Related Documents: Standards of Conduct and Compliance Policy

Policy Owner: Compliance Department

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