

Policy Number		Policy/Operational Procedure Name	
COM.0019v1		Downstream Provider Oversight Policy	
Sponsor		Custodian	
Rachel Davis		Rachel Davis	
Department Name		Company Name	
Compliance		Alivi	
Effective Date (s)	Review Date	Next Review Date	
1/1/2025		1/1/2026	
Approved By	Policy Location	Citation	
Compliance	AliviNet - Compliance SharePoint	42 C.F.R. §§ 422.503(b)(4)(vi), 422.504(i), 423.504(b)(4)(vi), 423.505(i); CMS Managed Care Manual Chapter 21, Section 40	

Policy Statement
This policy establishes the framework for the oversight of downstream providers to ensure compliance with regulatory requirements, organizational standards, and contractual obligations.
Scope
This policy applies to all downstream providers contracted with Alivi to deliver services to our members.
Procedure
<p><b>Definitions:</b></p> <p><b>Downstream Provider:</b> means any party that enters into an acceptable written arrangement below the level of the arrangement between an MA organization (and contract applicant) and a first-tier entity. These written arrangements continue down to the level of the ultimate provider of health and/or administrative services.</p> <p><b>FDR Provider Attestation</b></p> <p>All downstream providers must sign a First Tier, Downstream, and Related Entity (FDR) Provider Attestation prior to hire and annually thereafter to confirm adherence to applicable federal, state, and contractual standards and requirements.</p> <p>The attestation focuses on the following, but not limited to, areas:</p> <ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• General Compliance and Fraud, Waste and Abuse Trainings</li> <li>• Office of Inspector General (OIG) and General Services Administration's System for Award Management (SAM) screenings</li> <li>• HIPAA Privacy &amp; Security</li> <li>• Reporting Mechanisms</li> <li>• Downstream Entity Oversight</li> <li>• Operational Oversight</li> <li>• Record Retention</li> <li>• Non-Discrimination</li> <li>• Cultural Competency &amp; Sensitivity</li> <li>• Conflict of Interest</li> <li>• Background Screening Requirements</li> <li>• Ownership &amp; Management Disclosure</li> </ul>

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### Credentialing Requirements

- Providers must successfully complete credentialing prior to their hire date. Credentialing ensures the provider meets professional qualifications and complies with the organization's standards.
- Providers are required to maintain their credentialing status throughout the duration of their contractual relationship. Refer to Alivi's Credentialing Policies for detailed credentialing criteria and procedures.

### Annual Audits

- A minimum of 5% of all active downstream providers will be audited annually to verify compliance with the standards outlined in their FDR Provider Attestation.
- Audit findings will be documented, and any non-compliance issues will require corrective action plans to be implemented within specified timeframes.

### Roles and Responsibilities

- Compliance Department
  - Oversees the implementation of this policy and ensures that all attestation and credentialing processes are adhered to.
  - Conducts annual audits and monitors corrective actions for non-compliant providers.
- Provider Network Management / Credentialing
  - Ensures timely collection of FDR Provider Attestations and maintains records of credentialing status.
  - Coordinates with the Compliance Department to address audit findings and ensure provider compliance.
- Downstream Providers
  - Comply with all attestation and credentialing requirements.
  - Cooperate with audits and implement corrective actions as required.

### References



Transportation  
Provider Compliance

### Revision Record

Revision Date	Version Number	Revised by	Revision Description
1/1/2025	V1	Rachel Davis	Policy Creation & Approval