



Third-Party Compliance Oversight 2021 Compliance Program Attestation Form

COORDINATED TRANSPORTATION SOLUTIONS, INC.

Third-Party Compliance Program Requirements

Coordinated Transportation Solutions (CTS) has a commitment to regulatory compliance which includes the requirement that third-parties meeting criteria for oversight are in compliance with all applicable regulations and industry best practices. These third-parties may be categorized as:

- Delegated and Downstream Entities (DDEs)
- First Tier, Downstream and Related Entities (FDRs)
- Subcontractors

CTS is required to effectively monitor and oversee its FDRs that assist in providing services for our Medicare members and ensure our contracted providers operate in compliance with the applicable laws and regulations required by the Center for Medicare and Medicaid Services (CMS). Therefore, CTS has developed a process to validate that each contracted DDE, FDR, and/or Subcontractor meets the terms and conditions of our contracts with various State, Federal and regulatory agencies. This attestation is to be completed within 90 days of contracting and annually thereafter. This is required by your contract with CTS.

Action Required: As an organization that provides services on behalf of CTS to their clients, you must complete the following questionnaire below verifying that your organization attests to meeting or is implementing a plan to meet all applicable components, of the CTS Third-Party Compliance Oversight Program.

By signing below, I attest on behalf of _____ Mlaker _____ that:

Compliance Policies and Code of Conduct

- Our Organization distributes Standards of Conduct and Compliance policies and procedures to employees and contractors within 90 days of hire, and then annually thereafter.
- Our Organization keeps a current log certifying that employees have received, read and agree to comply with Standards of Conduct and Policies and Procedures and discloses conflicts of interest within 90 days of hire and annually thereafter.

Cultural Sensitivity and Section 1557

- Our Organization distributes the Cultural Sensitivity and Section 1557 to employees and contractors within 90 days of hire and then annually thereafter.
- Our Organization keeps a current log certifying that employees have received, read and agree to comply with Standards of Conduct and Policies and Procedures and disclose conflicts of interest within 90-days of hire and annually thereafter.

General Compliance and FWA Training

- Our Organization conducts and keeps a record certifying that general compliance and fraud, waste, & abuse (FWA) training is completed within 90 days of hire and annually thereafter.

Exclusion List Screening Requirements

| | • Medicare | • Medicaid/CHC/DDE/CHIP |
|---|----------------------|-------------------------|
| • <u>OIG Exclusion List</u> | • Pre-hire & Monthly | • Pre-hire & Monthly |
| • <u>GSA/SAM Exclusion List</u> | • Pre-hire & Monthly | • Pre-hire & Monthly |
| • <u>State Exclusion Lists, if applicable</u> | • N/A | • Pre-hire & Monthly |

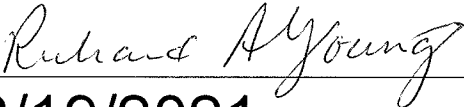
- Our Organization is not excluded from participating in Federally-funded health care programs according to the Department of Health and Human Services (DHHS), Office of the Inspector General (OIG), General Services Administration (GSA), and State programs (if applicable).
- Our Organization reviews the DHHS, OIG, GSA and State (if applicable) lists of excluded parties prior to the hiring or contracting of any new employees, officers and directors, board members, subcontractors, consultants or vendors, and monthly thereafter.
- Our Organization will immediately disclose all exclusions of employees, officers and directors, board members, subcontractors, consultants, or vendors to the CTS Compliance Office at Compliance@CTSTransit.com or Phone 855-262-0865 and immediately remove them from work directly or indirectly related to federal health care programs.

Reporting Mechanisms

- Our Organization widely publicizes CTS's Fraud and Compliance Hotlines or has a process for reporting compliance concerns and potential FWA directly to CTS if their business is directly impacted. The Organization also agrees to report suspected or actual incidences of program non-compliance and/or FWA, if discovered.

Record Retention

- Our Organization stores proper documentation in a safe and secure facility with back-up capabilities for at least ten (10) years following the end of the Agreement and will supply documentation to support the above responses upon request.

| Organization Information | |
|--|--|
| Print Name Richard A. Young | Organization's Name Mlaker |
| Title VP of Operations | NPI or Tax ID# 463251626 |
| Signature  | Street Address 1976 Valley View Drive |
| Date: 08/19/2021 | City, State, Zip Code Davidsville Pa 15928 |

Please return to:
 Third Party Compliance Oversight Department
 Email: thirdpartycompliance@CTSTransit.com
 Coordinated Transportation Solutions
 35 Nutmeg Drive, Suite 120
 Trumbull, CT 06611-5421