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**Third-Party Compliance Oversight
2022 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 compliant 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 TOWN OF LANCASTER 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.



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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.

Subcontracting Requirements

- Our Organization will notify CTS prior to using any offshore individual or entity to perform any service related to CTS’ Medicare and Medicaid lines of business. For offshore subcontractors that provide services on behalf of CTS, our Organization will submit required subcontractor information including legal name and contact information necessary for a CMS attestation regarding the offshore services provided.

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
• <u>Foreign Assets Control Sanctions</u>	• Pre-hire & Monthly	• Pre-hire & Monthly
• <u>National Sex Offender Registry</u>	• Pre-hire & Annually	• Pre-hire & Annually

National Sex Offender Registry Screening Requirements

- Our Organization screens all employees, officers and directors, board members, subcontractors, consultants, and vendors against the US National Sex Offender Registry prior to hire and at least annually thereafter.
- Our Organization will immediately disclose any employee, officer and directors, board members, subcontractors, consultants, or vendors that appear on the US National Sex Offender Registry 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 federally funded healthcare programs.
- Screening against the National Sex Offender Registry can be completed here: [United States Department of Justice National Sex Offender Public Website \(nsopw.gov\)](https://www.nsopw.gov)

Exclusion List Screening Requirements

- 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, OFAC, 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



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Compliance@CTSTransit.com or Phone 855-262-0865 and immediately remove them from work directly or indirectly related to federal health care programs.

- Prior to going live, providers must supply their driver roster and the first OIG/SAM screening results for those drivers, which would fulfill the pre-hire requirements, when joining the CTS Transportation Provider network. Whether you elect below to conduct your own monthly Exclusion List Screenings (which are subject to audits by CTS) or the preferred method to have CTS conduct those, we will need your first searches and driver roster before any trips will be assigned to your organization.
- Please remember that as part of your hiring process, your organization should be performing pre-hire OIG/SAM searches before making a job offer to make sure that an applicant is not on the exclusion list.
- If you choose to complete your own Exclusion Screenings, you can utilize the below listed resources:
 - OIG - <http://exclusions.oig.hhs.gov/>
 - SAM - <https://www.sam.gov/portal/public/SAM/>
 - Foreign Assets Control Sanctions - <https://home.treasury.gov/policy-issues/office-of-foreign-assets-control-sanctions-programs-and-information>
 - National Sex Offender Registry - [United States Department of Justice National Sex Offender Public Website \(nsopw.gov\)](http://www.nsopw.gov)

Action Required: CTS offers Exclusion List Screening services to all our transportation providers. If your organization would like to opt into this service, CTS will conduct the monthly screening for the organization and its employees. Please indicate below whether you will be using this service or choose to conduct your own screenings each month.

- Our Organization will conduct our own pre-hire and monthly Exclusion List Screenings and acknowledge CTS may request evidence of these screenings whenever necessary.
- Our Organization elects to have CTS conduct monthly Exclusion List Screenings on behalf of our Organization and employees. Our Organization acknowledges that we remain responsible for pre-hire screenings.

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.



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Print Name: <i>Kellie Sabouni</i>	Organization's Name: TOWN OF LANCASTER
Title: <i>Billing Manager</i>	NPI or Tax ID #: 1033246624
Signature: <i>Kellie A Sabouni</i>	Street Address: 25 MAIN STREET
Date: <i>6/10/22</i>	City, State, Zip Code LANCASTER, NH, 03584

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