QUARTERLY COMPLIANCE AND PROGRAM UPDATES



FDR Newsletter

QUARTER 2 | JUNE 2021

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The Banner – University Health Plans Compliance Program is committed to compliance and meeting requirements of all applicable laws and regulations of CMS and AHCCCS.



IN THE NEWS

Cultural Competency

Banner – University Health Plans (B – UHP) promotes cultural competency for its staff, provider network, and members. Cultural competency is an awareness and appreciation of customs, values, and beliefs and the ability to incorporate them into the assessment, treatment and interaction with members. We have a Cultural Competency Committee and Program as well as a Cultural Competency Liaison who creates education programs for the specific audiences of staff, providers, and members. This education comes in the form of provider education sessions and in-services, member and provider newsletter articles, staff in-services, and many other forms of communication forums.

The goal of the Cultural Competency Committee is to ensure that members are provided with culturally competent care and services by the health plan staff and the provider network. The purpose is to increase awareness of how our cultural assumptions and language affect interactions with others, including but not limited to, patient care. This does not mean each person will be competent in all cultures, but that each person should be aware that people may have different perceptions of health care based on their respective cultures. These cultures should be considered when helping and caring for members

The following resource is provided by the Cultural Competency Coalition:

Provider & Patient Communication Guide

AHCCCS Postpones ROPA to Jan 2022

As of May 27, 2021, due to the continuing public health emergency and in an effort to ensure that no members experience disruptions in care, the ROPA registration deadline has been extended to the latter of January 1, 2022 or the end of the public health emergency.

COMPLIANCE UPDATES

Offshore Activities

The term "Offshore" refers to work not performed within one of the fifty United States or one of the United States Territories. AHCCCS does not allow any Medicaid activities involving Protected Health Information (PHI) to be performed offshore. This includes the accessing, receiving, processing, transferring, handling, or storing of Banner – University Family Care Medicaid member PHI offshore.

As a reminder, if you enter into a contract with another entity, you are required to enforce AHCCCS's Off-Shore prohibition. For Medicare, Banner Medicare Advantage Plans and Banner – University Care Advantage are required to report offshore activities to CMS. If you engage in offshore activities, you must complete and submit an offshore attestation to the Banner Insurance Division Compliance Department. This attestation is CMS's assurance that you have taken the appropriate steps to address the risks associated with the use of subcontractors operating outside of the U.S.

Organizations must submit one attestation for each offshore subcontractor that you have engaged to perform Medicare related activities. Given the unique risks associated with the use of subcontractors operating outside of the US, you must take extraordinary measures to ensure that offshore arrangements protect PHI, including oversight requirements and audits of the offshore activities.

If you identify or suspect offshore activities, immediately notify the Banner Insurance Division Compliance Department:

ComplyLine 24-hour hotline (anonymous reporting): 888-747-7989

Email: BHPCompliance@BannerHealth.com

Secure Fax: (520) 874-7072

Compliance Department Mail:

Banner Medicaid and Medicare Health Plans Compliance Department

2701 E Elvira Rd Tucson, AZ 85756

Reminders:

Please be sure to complete the FDR 2021 Compliance Attestation before September 30, 2021

FDRs are required to communicate identified compliance or FWA issues for any of our health plan activities/members

REPORT ACTUAL OR POTENTIAL FWA, OR NON-COMPLIANCE

ComplyLine:

1-888-747-7989 (Reports can be made anonymously 24/7)

Secure Fax:

(520)874-7072

U.S. Mail:

Banner – University Health Plans Compliance Department 2701 E. Elvira, Tucson, AZ 85756

Email:

BHPCompliance@bannerhealth.com

Visit us online at www.BannerUHP.com