



Department: COMPLIANCE DEPARTMENT	Version #: 3
Title: Centers for Medicare & Medicaid (CMS) Relations	
Process Owner: Chief Compliance Officer	Date Created: 10/18/2018 Last Reviewed Date: 4/26/2023
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Printed copies are for reference only. Please refer to the S/Policies and Procedures for the most recent version.

Purpose: This policy helps ensure ATRIO maintains positive relationships with CMS and defines the process to ensure other resources have been exhausted before escalating a question to CMS.

Summary: This policy provides guidance to the operational areas on submitting requests to Compliance to request clarification of CMS laws, rules, or guidance.

Scope: This policy applies to all ATRIO staff.

Definitions: "ATRIO staff" includes employees, individuals contracted with ATRIO (i.e., consultants, temporary employees, etc.), and first tier, downstream, and related entities that administer ATRIO benefits.

Policy: The Chief Compliance Officer oversees and is responsible for managing ATRIO's relationship with CMS. The Chief Compliance Officer, in conjunction with Executive Leadership, is responsible for deciding when it is appropriate to contact CMS (which includes the assigned ATRIO CMS Account Manager, any other personnel at CMS, and all CMS general or specialty mailboxes) to ask a question.

In an effort to ensure only valid questions (that are unable to be answered by the ATRIO Compliance Department through research or review of existing regulations and guidance) are sent to CMS, ATRIO staff is prohibited from directly contacting CMS via any medium about an ATRIO-related question without prior written approval from the President & CEO, or the Chief Compliance Officer or their designee.

When ATRIO staff encounters any federal regulation or guidance that is unclear and requires further interpretation, needs to know whether guidance or a regulation exists related to a specific topic, or has any other question they believe would be appropriate to be answered by CMS, they will send the question to the Compliance Department for review, research, and response using the process set forth below.

ATRIO staff will submit an inquiry, in writing, to the Compliance mailbox (Compliance@atriohp.com). The written inquiry will include:

- A full description of the question that needs to be resolved;

- Any known corresponding regulations, rules or guidance; and
- When the information is needed and/or urgency.

The Chief Compliance Officer or their designee will determine appropriate handling of the question.

Resources:

Compliance Program Disciplinary Standards