## **Compliance and Regulatory Affairs - Introduction**

As a pharmacy benefit manager (PBM), Navitus Health Solutions is committed to ensuring it is fully compliant with all laws, regulations and standards.

In addition, as a PBM that provides services on behalf of a Medicare Part D prescription drug plans, Navitus is a first-tier entity. In this role, we have been delegated certain responsibilities and must ensure that we and our participating network pharmacies, vendors and subcontractors (downstream and related entities) are all in compliance with the applicable laws, rules and regulations.

Being compliant with laws and regulations includes following guidelines for compliance issued by the Centers for Medicare and Medicaid Services (CMS) and the Office of Inspector General of the U.S. Department of Health and Human Services (HHS/OIG). These guidelines state that vendors and contractors, to whom we delegate part of our services, must follow the same compliance guidelines, laws, regulations and standards as Navitus, as long as those services are provided to or on behalf of Navitus.

On this site, you will find compliance resources you need as a vendor, contractor or subcontractor to learn about Navitus' compliance requirements. The purpose of this Compliance Guide website is to assist FDRs in understanding and meeting their compliance obligations under the Navitus Compliance Program. The FDR Handbook and website contain the CMS requirements and the steps you need to follow to comply as a downstream entity of Navitus Health Solutions. Please review this site to make sure you have internal processes to support your compliance with these requirements each calendar year. To ensure ongoing compliance, Navitus conducts random audits, which request evidence of your compliance with the elements contained in this guide.

On this site, you will find compliance resources you need as a vendor, contractor, or subcontractor to learn about Navitus' compliance requirements. These resources include:

- the Navitus Vendor Code of Conduct
- information about the Navitus confidential reporting Hotline
- information about training requirements and how to obtain a copy of the CMS Compliance and FWA training modules
- a copy of the mandatory Attestation form and how to submit the annual form online

Our partnership ensures that Navitus continues to provide high quality service while adhering to the highest standards of ethics and compliance.

