



Appendix E:
Offshore Subcontractor Attestation

Enter your pharmacy name, name and title of person completing this form, and the date that you completed this attestation:	
Name:	
Title:	
Signature:	
Date:	
Please provide a copy to: Navitus Health Solutions, LLC, Pharmacy Network Development 2601 West Beltline Highway, Suite 600 Madison, WI 53713 You may also email credentials@navitus.com or fax the form to 866-808-4649.	

Part I. Offshore Subcontractor Information	
Offshore Subcontractor Name:	
Offshore Subcontractor Country:	
Offshore Subcontractor Address:	
Describe Offshore Subcontractor Functions:	
State Actual Effective Date for Offshore Subcontractor: (Month, Day, Year: Example January 15, 2015)	

Part II. Precautions for Protected Health Information (PHI)	
Describe the PHI that will be provided to the offshore subcontractor:	
Discuss why providing PHI is necessary to accomplish the offshore subcontractor objectives:	
Describe alternatives considered to avoid providing PHI, and why each alternative was rejected:	



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Part III. Attestation of Safeguards to Protect Beneficiary Information in the Offshore Subcontract		
Item	Attestation	Response Yes\No
I.1	Offshore subcontracting arrangement has policies and procedures in place to ensure that Medicare beneficiary PHI and other personal information remain secure.	
I.2	Offshore subcontracting arrangement prohibits subcontractor's access to Medicare data not associated with the sponsor's contract with the offshore subcontractor	
I.3	Offshore subcontracting arrangement has policies and procedures in place that allow for immediate termination of the subcontract upon discovery of a significant security breach	
I.4	Offshore subcontracting arrangement includes all required Medicare Part C and D language such as record retention requirements, compliance with all Medicare Part C and D requirements, etc.	

Part IV. Attestation of Audit Requirements to Ensure Protection of PHI		
Item	Attestation	Response Yes\No
II.1	Organization will conduct an annual audit of the offshore subcontractor	
II.2	Audit results will be used by the Organization to evaluate the continuation of its relationship with the offshore subcontractor	
II.3	Organization agrees to share offshore subcontractors audit results with CMS upon request	