



OFFSHORE SUBCONTRACT INFORMATION AND ATTESTATION

Part I. Medicare Part C Organization and Part D Plan Sponsor Information

1. Legal Name: Fallon Community Health Plan
2. Contracts: _____ *Official Use*

Part II. Offshore Subcontractor Information

FCHP has contract in place with the entity listed in 1(a) below, which has a subcontract in place with the related entity listed in 1(b) which has [a] portion[s] of its business operations performed outside the United States of America as listed in 1(c) below:

1. (a) Contractor entity name(s):

- (b) Offshore subcontractor entity name:

_____	_____
_____	_____
_____	_____

- (c) Offshore subcontractor entity foreign address(es):

_____	_____
_____	_____
_____	_____

2. Offshore subcontractor functions:

3. The effective date of the offshore contract(s):

Part III. Precautions for Protected Health Information (PHI)

1. Describe the PHI that is provided to the offshore subcontractor:

2. Discuss why providing PHI is necessary to accomplish the offshore subcontractor's objectives:

3. Describe alternatives considered to avoid providing PHI, and why each alternative was rejected:

ATTESTATION CONCERNING THE USE OF OFFSHORE CONTRACTORS

Name of MAO or PDP Sponsor:
Contract Number:

Fallon Community Health Plan
 _____ *Official Use*

Part I. Attestation of Safeguards to Protect Beneficiary Information in the Offshore Subcontract

	Attestation	Yes	No
I.1.	Offshore subcontracting arrangement has policies and procedures in place to ensure that PHI and other personal information remains secure.		
I.2.	Offshore subcontracting arrangement prohibits subcontractor's access to data not associated with the sponsor's contracts.		
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 (e.g., record retention requirements, compliance with all Medicare Part C and D		

