

## **Fraud and Abuse Training Required??**

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Since October 2009, members have been receiving information from their Medicare Advantage plans stating that all healthcare practitioners/providers or staff who render healthcare services to Medicare Advantage enrollees must complete Fraud, Waste and Abuse (FWA) Training by December 31, 2009 and annually thereafter.

The Centers for Medicare & Medicaid Services (CMS) requires Medicare Advantage plan sponsors to have policies and procedures to identify and address fraud, waste and abuse (FWA) in health care services delivered through the Medicare Advantage benefit. This regulation can be found within the Federal Code of Regulations, title 42 parts 422.503 and 423.504.

It is true that CMS also requires Medicare Advantage plan providers to have a procedure in place to facilitate FWA training and education. CMS stipulates that Medicare Advantage Organizations and Part D Plan Sponsors are ultimately responsible for training entities and providers who render service to Medicare health plan members to meet CMS' contractual requirements.

If you have a written compliance plan, you should be conducting FWA training on all new hires and annually for all employees. Most Medicare Advantage plans are accepting your internal program for purposes of that required in 42 CFR 422.503. If you do not have a compliance plan and you participate in at least one Medicare Advantage plan, you need to complete FWA before the end of the year.

Most Medicare Advantage plans have either already sent a letter or have instructions on their website on how to attest that all employees of the practice have participated in an FWA training session sometime during 2009.

Some plans have created free PowerPoint presentations that can be used to meet the FWA training requirements. For example:

- Providence Health Plans  
<http://www.providence.org/healthplans/pdfs/providers/FWA-instructions-and-training-requirements.pdf>
- UnitedHealthcare  
[https://www.oxhp.com/secure/materials/providers/UHC\\_Mcare\\_2009\\_Fraud\\_Waste\\_Abuse\\_Training.pdf](https://www.oxhp.com/secure/materials/providers/UHC_Mcare_2009_Fraud_Waste_Abuse_Training.pdf)

CMS has a course on the MedLearn Network that can be accessed on the CMS website

[http://cms.meridianksi.com/kc/ilc/course\\_info\\_enroll\\_lnkfrm\\_f1.asp?lgnfrm=wbt&table=crs&function=course\\_info\\_enroll&strBuildingID=5&strFunctionID=37&strFunctionPath=37&strFrom=Search&topic=All&keywords=](http://cms.meridianksi.com/kc/ilc/course_info_enroll_lnkfrm_f1.asp?lgnfrm=wbt&table=crs&function=course_info_enroll&strBuildingID=5&strFunctionID=37&strFunctionPath=37&strFrom=Search&topic=All&keywords=)

Other Medicare Advantage plans, e.g., Anthem Blue Cross and Blue Shield, have developed an FWA training plan that can be purchased. Anthem included the following in their *Network Update*, Issue 3 2009:

If your practice does not have a training program, the National Health Care Antifraud Association (NHCAA), in conjunction with the Blue Cross and Blue Shield Association (BCBSA), has launched an online Fraud, Waste and Abuse General Compliance Training Course. This course was developed in collaboration with LearnSomething, Inc., a leading producer of customized, multimedia training

and learning management solutions. This online training program was specifically developed to help Medicare Advantage first tier and downstream contractors meet CMS compliance requirements.

You can access the online training via the course portal at [wellpoint.learnsomething.com](http://wellpoint.learnsomething.com). The course is reasonably priced (volume discounts are available) and can also be purchased through the link.

Please understand that other health plans may require additional information to substantiate the completion of the training.