

ATTESTATION FORM FOR FWA & GENERAL COMPLIANCE TRAINING
for MEDICARE ADVANTAGE

I, _____ represent this entity and my initials and signature below serve as an attestation this entity meets the requirement to provide annual training for General Compliance and Fraud, Waste and Abuse (FWA). I understand CHRISTUS Health Plan is required to capture a Training Attestation Form from (FDRs) first tier, downstream, and related entities (FDRs) contracted to provide health, prescription, and/or administrative services to CHRISTUS Members. CHRISTUS is required to learn if FDRs use the CMS training or an alternative. I understand CHRISTUS retains the authority to audit and has a mandatory requirement to report findings of (FWA) fraud, waste and abuse to federal, state, and local agencies, as appropriate.

Entity Name: _____ (Contractor/IPA/Medical Group/Hospital/Pharmacy)

Submitting Organization: _____
(Such as MSO, TPA, if other than IPA/Medical Group or Hospital or Contractor)

Print Your Name: _____ **Title:** _____
(Principal Officer, Training Manager or Contract Signatory Authority)

_____ **I attest that we have a corporate compliance program and plan that meets the following conditions:**

- Initial**
- Includes the above mentioned elements and practices consistent with 42 CFR 438.608
 - Complies with compliance requirements specified in 42 CFR 455
 - Implemented by the contract start date as described within the CHRISTUS contract requirements

_____ **I attest that we will immediately notify CHRISTUS of the following:**

- Initial**
- Any employee, vendor, or downstream entity (FTD) terminated or otherwise disciplined for Medicare or Medicaid non-compliance and/or fraud, waste, and abuse
 - Any other suspected or known instance of Medicaid, Medicare, and CHRISTUS policy and procedure noncompliance and/or fraud, waste, and abuse

Check only one of the boxes “☐” below, related to the annual training requirement:

- All our employees, providers and contractors complete the **CMS** February 2016 **“Medicare Learning Network (MLN) Fraud, Waste and Abuse Products and General Compliance Training”** in 2017 by using the CMS Training documents found at <https://www.CMS.gov/Outreach-and-Education/Look-Up-Topics/Fraud-and-Abuse/Fraud-page.html> ; *or*
- All employees, providers and contractors complete an **alternate equivalent** Medicare Advantage General Compliance and Fraud Waste and Abuse Training in 2017. Also, we have integrated alternate training into the “new hire” process and when contracting with new providers, pharmacies and contractors.

Your Signature: _____

Date: _____

E-mail: _____

Phone: _____

General Office E-mail: _____

Phone: _____

- **EMAIL:** Please scan the form and send it as an email attachment to CHRISTUSHealthSIU.org *or*
- **FAX:** 210 766-8849
- **MAIL:** CHRISTUS Health Plan – Training Attestation
SIU and Compliance Department, 4th Floor - 4051 G4 - ext. 2-3027
919 Hidden Ridge Drive, Irving, TX 75038

**Please respond by
November 30, 2017**

SIU and Compliance Team
 CHRISTUS Health Plan – Training Attestation
 919 Hidden Ridge Drive, 4th Floor - 4051 G4 - ext. 2-3027
 Irving, TX 75038

November 2017

Re: Request for a Signed Attestation for Completion of 2 MANDATORY Annual Trainings

1. General Compliance Training, ***and***
2. Health Care Fraud, Waste and Abuse Training

You have been identified as an entity associated with CHRISTUS Health Plan and are required to complete mandatory annual training, listed below as Option 1 or 2, in order to satisfy the Medicare part C & D training regulations. As a Managed Care Operator (MCO), CHRISTUS Health Plan must receive annual evidence their associate entities complete the required trainings. As evidence for the completion of training, CHRISTUS captures a signed **TRAINING ATTESTATION FORM** via eMail, FAX or MAIL. The above attestation form should be completed, signed and returned to CHRISTUS no later than Nov 30, 2017. A copy of this letter is available at <https://www.christushealthplan.org/providers/forms>. Below are the two training options.

OPTION 1: The Medicare Learning Network (MLN) has a [Learning Management System \(LMS\)](#) providing free, 24/7 access to web-based training (WBT) courses. To log into the CMS training catalog or to establish a new learner account, visit <https://learner.mlnlms.com/Default.aspx>. The following courses can be integrated into your company's existing annual training programs.

- 1 of 2 Trainings: 1) **Combating Medicare Parts C and D Fraud, Waste and Abuse, *and***
- 2 of 2 Trainings: 2) **Medicare Parts C and D General Compliance Training**

OPTION 2: If you have completed a similar training in 2017, that covers both General Compliance ***and*** Fraud Waste and Abuse, and meets the CMS guidelines, then you have satisfied the mandatory training requirement. If so, please select Option 2 on the attestation form, Page 4.

If you ***do not*** provide internal training, please have the required staff enroll in the online MLN Learning Management System (LMS) at <https://learner.mlnlms.com/Default.aspx>, and complete the two required courses listed above. Only one Manager or Training Representative need sign the Attestation Form. The signed form attests the entity complies with the annual training requirement. CHRISTUS should receive only **one signed TRAINING ATTESTATION form per entity.**

The Attestation Form is due by the date listed on the form. If you have questions, please contact your CHRISTUS representative or call 469-282-3027 with questions.

Sincerely,

CHRISTUS Contracting and Compliance Team

469-282-3027

2017 General Compliance and Fraud, Waste and Abuse (FWA) Training

Attestation of Training Requirements

CHRISTUS Contracting and Compliance Team

Introduction

The Training Attestation Form (Page 1) and the CMS Training option is provided to help you meet the annual training regulations. (Medicare part C & D training regulations for General Compliance and Fraud, Waste, and Abuse). Each entity must provide evidence that they have a process for tracking and oversight for completion of required training.

Instructions

Please ensure that to the extent required, all appropriate staff has completed the CMS General Compliance and Fraud, Waste, and Abuse Training or a similar program approved by the Compliance Director. The attached attestation should be completed and returned to CHRISTUS by **11/30/2017**. A record of the chosen training option must be retained for 10 years, as per CMS requirements. The evidence General Compliance and FWA Training is occurring at this entity is submission of a completed Attestation Form (See Page 1) to CHRISTUS. There are two options for training.

- OPTION 1: Completion of the CMS provided training
- OPTION 2: Completion of a comparable Fraud, Waste, and Abuse training

Background

The Federal Government requires that seven key elements are included in the Compliance/FWA program. Each of these helps to detect, correct and prevent issues, which arise in the course of our business that could compromise the integrity of our organization and our ability to perform our services in compliance with the requirements of the program. The key elements include the following:

- Written Policies, Procedures and Standards of Conduct
- A Compliance Officer, Compliance Committee and High Level Oversight
- Effective Training and Education
- Effective Lines of Communication
- Well-Publicized Disciplinary Standards
- Effective System for Routine Monitoring, Auditing, and Identification of Compliance Risks
- Procedures and System of Prompt Response to Compliance Issues

What does this mean?

The entity may integrate the CMS training courses into the company's compliance program as one element of training **OR**, if you already have similar internal staff training curriculum included (General Compliance and Fraud Waste and Abuse Training), you can satisfy the mandatory training requirement.

What is NOT included in this training that requires separate oversight?

- Code of Conduct and Ethics
- New hire and monthly screening against the Office of Inspector General (OIG) and General Services Administration (GSA) sanction and exclusion lists

- HIPAA security privacy and confidentiality and reporting security incidents and breaches
- Training on internal policies and procedures

How often is training required?

- Upon initial hire, and annually thereafter
- Whenever updates are made to Policy and Procedures,

What are the supporting Regulatory Requirements?

- Medicare Managed Care Manual Chapter 21 for Part C & Chapter 9 for Part D (combined guidance)
- Code of Federal Regulations
- OIG compliance program guidance

How do I Submit the Attestation Form?

- **eMAIL:** Please scan the form and send it as an attachment via e-mail to CHRISTUSHealthSIU.org **or**
- **FAX:** 210 766-8849
- **MAIL:** CHRISTUS Health Plan – Training Attestation
SIU and Compliance Department,
4th Floor - 4051 G4
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Irving, TX 75038

**Please respond by
November 30, 2017**

Please see the attestation form above on page 1.