



**Medicare
General Compliance
and
Fraud, Waste and Abuse (FWA)
Compliance Training
Instructional Guideline MA Plans, PDP Sponsors and Provider
Organizations**

Summary

The Centers for Medicare and Medicaid Services (CMS) requires annual training in General Compliance and Fraud, Waste and Abuse (FWA). The training requirements apply to all entities (first tier, downstream or related entities) that provide either administrative services or health care or prescription drug services under contract with a Medicare Advantage (MA) or Prescription Drug Plan (PDP). (See 42 CFR 422.503 “Medicare Advantage Programs” and 42 CFR 423.504 “Voluntary Medicare Prescription Drug Benefit”)

The ICE Contracting and Compliance Team’s General Compliance and FWA presentation was designed to meet the requirements for CMS General Compliance and FWA training and it is available for use by MA health plans, delegated provider organizations, and PDP sponsors. The goal of the ICE training is, to simplify and standardize required training across the HMO delegated health care delivery system. To fulfill MA health plan obligations to the CMS, a MA health plan or PDP sponsor may conduct audits or require other oversight reporting to validate the annual CMS training requirements were met, such as evidence that the General Compliance and FWA training materials have been made available or have been distributed to its downstream providers.

How a Medicare Advantage Plan (MA) or prescription Drug Plan (PDP) or Delegated Provider Organization can use the ICE Presentation, and other options available

The ICE training document can be found in the Contracting and Compliance sub-folder within the approved ICE documents folder in the Library at the ICE Web site

<http://www.iceforhealth.org/library.asp?sf=&scid=2047#scid2047>

MA health plans and PDP sponsors – delegated provider organization may add the name and logo of their business to the ICE tool. Additionally the plans and sponsors may include the names, title and email addresses of the person (s) responsible for internal reporting of FWA concerns. The document can be used to train internal health plan staff, medical groups, vendors and other first tier, downstream and related entities.

Are Medicare providers required to take this training?

First tier, downstream and related entities may, as another option, choose to customize the ICE training to focus on the general compliance training elements for Medicare providers who have taken the FWA training as part of their Medicare certification.

If an FDR has taken the Medicare FWA training is the ICE training needed?

The ICE training combines the FWA and General Compliance training requirements. The training can be customized to include the general compliance training if you prefer to take the CMS standardized FWA training and education module. The module is available through the CMS Medicare Learning Network (MLN) at <http://www.cms.gov/MLNProducts>.

The ICE Background and Attestation document includes additional background information regarding the training requirements and the supporting regulatory requirements.