

## Frequently Ask Questions – Compliance Training

### **1. Does my organization have to conduct Fraud, Waste and Abuse (FWA) and General compliance training?**

Yes, FDRs that perform services related to Community Care's Parts C and D programs must complete FWA and General Compliance training.

### **2. Who must be trained?**

FDRs need not train their entire staff. However, FDRs should at minimum train the following individuals:

- Senior administrators or managers directly responsible for the FDR contract with Community Care (e.g., Senior Vice President, Departmental Managers, Chief Medical Officer, or Pharmacy Officer)
- Individuals directly involved with the decision-making authority (e.g., clinical decisions, coverage determinations, appeals and grievances, enrollment/disenrollment functions, or processing of pharmacy and medical claims)
- Reviewers of beneficiary claims and services submitted for payment
- Individuals that job functions placed them in a position to commit significant noncompliance with CMS program requirements or FWA

### **3. When must training be completed?**

Training must be completed:

- Within 90 days of hire or effective date of contracting
- At least annually during each calendar year thereafter

Your organization must maintain evidence of completing these training requirements. Evidence can be in the form of certificates, attestations, training logs, or other documents that best represent your fulfillment of your training requirements. Training records must be maintained for no less than 10 years.

### **4. What should be included in the training?**

FDRs are responsible for developing and conducting their own FWA and General compliance training. Training topics should include but are not limited to the following:

- **FWA/General Compliance Training**
  - Code of Conduct/Policies and Procedures

- Mechanisms for reporting instances of non compliance or FWA without fear of retaliation (provide examples of noncompliant behavior)
- Gifts and Gratuities
- Conflicts of Interest
- HIPAA/HITECH
- Laws and regulations related to Parts C and D FWA (i.e., False Claims Act, Anti-Kickback statute)

Community Care realizes that every organization is unique; therefore, you must construct training that meets the needs of your organization.