



INDUSTRY COLLABORATION EFFORT (ICE)

Contracting and Compliance Team

Attestation of Compliance

2016 General Compliance and Fraud, Waste and Abuse (FWA) Training

Introduction

The attached attestation and training materials are being provided to assist you with meeting the annual Medicare part C & D training regulations for Fraud, Waste, and Abuse. Each entity must be able to evidence 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 Network Medical Management (NMM) program entitled Compliance: Fraud, Waste, and Abuse Training- or completed a similar program approved by the Compliance Director. The attached attestation should be completed following the training exercise and returned to NMM by **12/31/2016**. A record confirming that the required training has occurred must be retained for 10 years consistent with CMS requirements. Evidence of General Compliance and FWA Training requirements may be met through:

- Attestation of completion of the NMM provided training
- Attestation of 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:

- 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?

This training can be integrated into your company's compliance program as one element of training **OR**, if you have similar training that you have already taken that included the General Compliance Requirements and Fraud Waste and Abuse requirement, that training can be used to demonstrate you have completed the required training.

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 Hire, When Updates are Made to Policy and Procedures, and Annually Thereafter

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



**** Return Response Required****

Submission Due Date: December 31, 2016

**MEDICARE ADVANTAGE GENERAL COMPLIANCE AND FWA TRAINING, OIG
ATTESTATION FORM**

Attestation Submission Instructions

The Attestation Form may be faxed or mailed or scanned and e-mailed to:

NMM COMPLIANCE DEPARTMENT

1680 SOUTH GARFIELD AVE, ALHAMBRA, CA 91801

Fax: (626) 943-6329 Email: FWACOMPLIANCE@NMM.CC

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

- **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 NMM contract requirements**

I attest that we will immediately notify NMM of the following:

- **Any employee, vendor, or downstream entity 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 NMM policy and procedure noncompliance and/or fraud, waste, and abuse**

NMM agrees to annually provide FWA training to first tier, downstream, and related entities that are contracted to provide health, prescription, and/or administrative services to NMM Members. I understand that NMM retains the authority to audit and is mandated to report fraud, waste and abuse findings to federal, state, and local agencies, as appropriate.

NMM provider screens all employees, officers, and vendors against the OIG/GSA Excluded Persons Lists prior to hire/contract, and monthly thereafter.

IPA/Medical Group/Hospital/Pharmacy/Contractor Name:

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

Phone#: _____ Fax#: _____

Principal Officer with Contract Signatory Authority:

Print Name Signature

Date Title

Please check (V) one or more of the following related to the annual training requirement:

LI I have completed the CMS February 2013 Medicare Parts C&D Fraud, Waste and Abuse Training and General Compliance Training for all employees, providers and contractors using the 2013 CMS Training documents. I also have integrated training into the new hire process and the process for contracting with new providers, pharmacies and contractors.

Date:

LI I have completed alternate equivalent MA General Compliance and Fraud Waste and Abuse Training for all employees, providers and contractors. I also have integrated that alternate training into the new hire process and process to contract with new providers, pharmacies and contractors.

LI Other Provide Explanation:

ICE/NMM Compliance Training Confirmation