

PROVIDER BULLETIN

PROVIDER INFORMATION



November 4, 2014

Medicare Training and Education Requirements

Providers that contract with Blue Cross and Blue Shield of Minnesota and Blue Plus (Blue Cross) to provide health, prescription drug or administrative services to Medicare enrollees must meet the Centers for Medicare & Medicaid Services (CMS) general compliance and fraud, waste and abuse (FWA) training. All provider types are required to **submit an attestation form annually** to Blue Cross indicating that general compliance and FWA training has been completed by the following persons, whether full-time, part-time, temporary or otherwise: employees, including senior managers and governing bodies; and contractors and subcontractors, including independent contractors. Training must be provided within 90 days of hiring or contracting, and annually thereafter.

There is one exception to the FWA training and education requirement. Providers are **not** required to take the Blue Cross Medicare FWA training and only need to take the general compliance training if you have met the FWA certification requirements through enrollment into Parts A or B of the Medicare program; or through accreditation as a supplier of Durable Medical Equipment, Prosthetics, Orthotics, and Supplies (DMEPOS).

Providers who do not meet the above criteria are required to take the general compliance and FWA version of the training offered by Blue Cross. In the past we have allowed you to take the training of another Medicare Advantage Organization or Part D Plan Sponsor; however, this year you are required to take the training we provide. The training and attestation form must be completed annually.

General compliance training

General compliance training is provided by Blue Cross and includes:

- A description of the compliance program, including policies and procedures and the Standards of Conduct
- An overview of how to ask compliance questions, request compliance clarification, or report potential non-compliance
- A review of disciplinary guidelines for non-compliant or fraudulent behavior
- Attendance and participation in formal training as a condition of continued employment
- A review of policies related to contracting with the government
- A review of potential conflicts of interest and the disclosure system
- An overview of the importance of confidentiality of protected health information (PHI), including an overview HIPAA and the CMS Data Use Agreement
- An overview of the monitoring and auditing work plan

Fraud, waste and abuse (FWA) training

FWA training is provided by Blue Cross and includes:

- Laws and regulations related to MA and Part D FWA (for example, False Claims Act, Anti-Kickback statute, HIPAA, etc.)
- Obligations of first-tier, downstream and related entities (FDRs) to have appropriate policies and procedures to address FWA
- A process for reporting suspected FWA
- Protections for employees who report suspected FWA
- Types of FWA that can occur

Additional information

For additional information regarding training or other compliance requirements, please consult Chapters 9 and 21, of CMS' Prescription Drug Benefit Manual and the Medicare Managed Care Manual, respectively, or visit www.cms.gov.

Blue Cross' training materials and the Attestation of Training completion form are available at providers.bluecrossmn.com, select Education center then Medicare education.

Questions?

If you have questions, please contact provider services at **(651) 662-5200** or **1-800-262-0820**.