



Medicare Advantage mandatory provider fraud, waste, and abuse training

BCBSNM is committed to compliance with the Centers for Medicare & Medicaid Services (CMS) requirements and to ensuring that our contracted providers remain in compliance. In December 2007, CMS published “Revisions to the Medicare Advantage and Part D Prescription Drug Contract Determinations, Appeals, and Intermediate Sanctions Processes; Final Rule,” which includes a requirement that plan sponsors provide all contracting providers (e.g., physician practices, facilities, DME providers) participating in a Medicare Advantage (Part C) network with fraud, waste, and abuse (FWA) training annually.

CMS specifies that participation in this training is mandatory for anyone in the provider’s practice who may communicate with a Medicare Part C beneficiary. BCBSNM will leave the decision as to whom in the practice or facility will require the training to the physician or compliance officer.

This rule became effective on January 1, 2009. **The training must be completed by December 31, 2009, for providers to remain active in the Part C network in 2010.**

This requirement grew out of an ongoing concern about the rising cost of health care combined with the overwhelming number of fraud, waste, and abuse cases involving the Medicare program and its beneficiaries. BCBSNM strongly supports this requirement because we believe that it is the right thing to do.

How to receive the training

To help providers meet this requirement, we will make the FWA training program for providers available on our website. To access the training, providers will click on a designated link to access the training course. No special software is required; however, you will need an Internet connection. ***Instructions for accessing the training will be posted in a future notice on our website and in an upcoming issue of Blue Review.*** The training will take approximately 45 to 60 minutes to complete and is narrated, so be sure to turn on the sound on your computer.

We recognize that because CMS requires that each Plan Sponsor make FWA training available to its participating providers, you might be inundated with training requirements, depending on the number of Part C networks you are participating in. To reduce the training burden, BCBSNM does not require that you complete our FWA training course specifically. **We will accept the following in lieu of our FWA course:**

- Completion of an FWA training course offered by any other Medicare Part C Plan Sponsor with whom you are contracted; *or*
- Completion of an FWA training course on the [Medicare Learning Network](#) (MLN); *or*
- Completion of an FWA training course offered by a hospital where you have admitting privileges; *or*



- Completion of your in-house-developed FWA training course as long as it includes the following:
 - Information about the various laws and regulations related to FWA; *and*
 - How to detect, prevent and correct FWA; *and*
 - How and where to report potential FWA violations; *or*
- Completion of your vendor-developed FWA training course as long as it includes the following:
 - Information about the various laws and regulations related to FWA; *and*
 - How to detect, prevent and correct FWA; *and*
 - How and where to report potential FWA violations.

Training must be completed by December 31, 2009.

At the completion of the training, BCBSNM will require that the contracting physician or compliance officer complete our online certification attesting that all employees identified as requiring FWA training have completed it. In addition, and in compliance with CMS regulations, the practice or entity will be required to maintain training logs and information on who completed the training, the date on which the training was completed, and what training program each employee completed. You must retain these records for 10 years, which is the Medicare record retention period. In addition, you must also make these training records available to BCBSNM as requested for audit purposes.

If you have questions about this CMS requirement, contact Cathie Rowland-Robert via [e-mail](#) or at **(505) 816-2132**.