

## **New information on requirements for CMS general compliance training about compliance and fraud, waste and abuse**

We've communicated in the past about the responsibility each core FDR (first tier, downstream, and related entity) has to complete annual training related to fraud, waste and abuse and compliance with Medicare requirements. This training is a requirement that BCBSM/BCN must make sure FDRs carry out. This is because BCBSM/BCN is required by the Centers for Medicare & Medicaid Services to ensure that its FDRs complete training as part of its compliance program.

**What's new.** We've recently learned that the only way for FDRs to generate a certificate of completion for this training is to take the training using the modules available at the Medicare Learning Network.

To fulfill the requirements for compliance training and generate a certificate of completion, you must do the following:

1. Click to open the [Medicare Learning Network® \(MLN\) Learning Management System](#).
2. Log in. (If you are a first-time user, you must create an account.).
3. Complete the following two training modules:
  - Medicare Parts C and D General Compliance Training
  - Combatting Medicare Parts C and D Fraud, Waste and Abuse
4. Generate a certificate of completion for each module.

Each employee, contractor, volunteer, governing body member, or downstream entity who provides health or administrative services for Medicare Advantage must have a certificate of completion on file from each training section (fraud, waste and abuse training and general compliance training -- two certificates in total).

Your staff must complete the training within 90 days of hire or contract and annually thereafter.

**Exception.** If you are a provider enrolled in Medicare Parts A or B, you're "deemed" to have satisfied the fraud, waste and abuse training requirement and you are not required to take additional fraud, waste and abuse training. However, you must still complete the general compliance training section and maintain a certificate as evidence of training completion.

**Alternative training option.** FDRs who wish to use their own training program must incorporate the content from both the [Medicare Parts C and D Fraud, Waste and Abuse Training](#) and the [Medicare Parts C and D General Compliance Training](#) modules into their training materials without modification and keep a record demonstrating completion of the training.

**Keep certificates on file.** Regardless of the training option you choose, the certificates of completion you generate or other evidence of training completion must be kept on file for 10 years following the expiration of the contract.

**Background on requirements.** As a reminder, CMS requires BCBSM/BCN, which receives payment from Medicare, to implement an effective general compliance program.

In order to satisfy CMS guidelines, this program must meet the minimum requirements established by federal statutes that pertain to Medicare Parts C & D (Section 1860D-4(c)(1)(D) of the Act, 42 C.F.R. §§ 422.503(b)(4)(vi), 423.504(b)(4)(vi)).

According to these guidelines, FDRs are required by CMS to take CMS-specific training about fraud, waste and abuse and compliance.

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URLs

1<sup>st</sup> URL = <https://learner.mlnlms.com/Default.aspx>

2<sup>nd</sup> URL = <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/CombMedCandDFWAdownload.pdf>

3<sup>rd</sup> URL = <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/MedCandDGenCompdownload.pdf>