Community Care Provider Fraud, Waste & Abuse (FWA) Training Requirement

February 7, 2018

Scope: This Provider Alert applies to all HealthChoices contracts.

Purpose: To update all providers (independent practitioners & agency-based) on FWA training resources and requirements.

Please refer to Provider Alert #9: Fraud, Waste & Abuse (FWA) Compliance & Program Integrity Update (April 28, 2017) which announced provider requirements relative to completion of FWA training and reporting of such training to Community Care.

Relative to FWA Training, Provider Alert #9, in part, articulated the following Provider Compliance Plan Requirements:

1. Providers must include a schedule of staff training on all applicable state and federal FWA laws, regulations & requirements (at least annually) within their Compliance Plan.

2. If necessary, by July 31, 2017, all providers were to amend their Compliance Plan to include an initial schedule of FWA staff training, as above. Providers were also instructed that the FWA training of their staff was to be completed by December 31, 2017.

3. Annually, Providers must continue to update their FWA training schedule within their Compliance Plan.

4. Annually, in the first calendar quarter of each year, beginning January 2018, Community Care will submit a request to each provider, via Survey Monkey email, for both verification of FWA training completion for the preceding calendar year (for Providers who have been under contract with Community Care for the full preceding year) as well as the schedule for FWA training for the upcoming year (all enrolled providers).

5. After the close of the first calendar quarter each year, Community Care shall compose & submit a report to the Primary Contract Administrator (the oversight authority responsible for the management of the distinct HealthChoices contracts under OMHSAS) summarizing provider FWA training completion and schedules.

6. During any on-site audits or site visits & upon request, providers shall provide a copy of current Compliance Plan, including FWA training schedule.
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**Training Resources**
Providers should utilize the training method and materials they choose to meet this requirement. Community Care has developed training, and resources for training, on the topic of FWA. Three new FWA training modules are available for provider use, located on the Community Care website as follows:

1. "Fraud Waste and Abuse Detection, Deterrence and Prevention: FWA 101"
2. "Fraud Waste and Abuse Detection, Deterrence and Prevention: Community Care FWA Audit Process"
3. "Fraud Waste and Abuse Detection, Deterrence and Prevention: Building Compliance"

**Provider FWA Training Attestation Requirement**
In February 2018, providers will receive, via email, a request to complete a survey and attestation regarding the above. Completion and submission of the survey and attestation is to be submitted to Community Care by **February 28, 2018**. The survey and attestation will contain the following inquiries:

- Both agencies and independent practitioners will attest that their **Compliance Plans include a schedule of staff training for 2017** on all applicable state & federal FWA laws, regulations & requirements & will provide dates of such training.

- Newly contracted agencies & independent practitioners who were not contracted for any HealthChoices products for the full 2017 calendar year, will be required to attest that they were contracted for HealthChoices after December 31, 2016 & therefore **were not required** to complete a schedule for training on all applicable state & federal FWA laws, regulations & requirements for **2017**.

- Both agencies & independent practitioners will be asked to attest that their **Compliance Plan currently includes a schedule of training for 2018** on all applicable state & federal FWA laws, regulations & requirements & will provide dates planned for the training.

- Independent practitioners will have the option to indicate that the attestation will be completed by the individual who is authorized & responsible for the compliance function at his/her practice.

- Community Care will report the results of this survey related to Provider FWA training to each respective Primary Contract Administrator.