



Mandatory Training Requirements for 2009

Dear Provider:

The purpose of this notification is to communicate important information regarding requirements that became effective January 1, 2009.

The Centers for Medicare & Medicaid Services (CMS) has mandated that all delegated and contracted providers who render benefits or services for Medicare Part C and Part D programs must meet the fraud, waste and abuse (FWA) training requirements by December 31, 2009.

This mandate applies to all health plans with Part C and Part D programs. As an 'Ohana Health Plan-delegated and/or -contracted provider, this requirement applies to you and your office staff.

The topics that must be addressed in the training are:

- Laws and regulations related to Medicare Advantage (MA) and Medicare Part D fraud, waste and abuse (i.e., False Claims Act, Anti-kickback statute, HIPAA, etc.)
- Obligations of the first-tier, downstream and related entities, to have appropriate policies and procedures to address fraud, waste and abuse.
- Process for reporting suspected fraud, waste and abuse of first-tier, downstream and related entities to the MA organization or prescription drug plan (PDP) sponsor.
- Protections for employees of first-tier, downstream and related entities, who report suspected fraud, waste and abuse.
- Types of fraud, waste and abuse that can occur in first-tier, downstream and related entities.

Revisions to the FWA training requirements are detailed in federal regulations at 42 C.F.R. § 422.503(b) (4) (vi) and 42 C.F.R. § 423.504 (b) (4) (vi).

'Ohana Health Plan recognizes that you may receive multiple requests to complete training to meet these new requirements. For your convenience, 'Ohana Health Plan has selected a web-based training portal that is also being utilized by several other health plans. This training portal, the National Health Care Anti-Fraud Association (NHCAA), will house the training program and track completion of those individuals who have completed the training requirements. This means that you can take the training and pay the fee once to fulfill the requirement of multiple participating health plans with which you contract.

The link to the training may be accessed at www.wellcare.learnsomething.com, the 'Ohana Health Plan Web site at www.ohanahealthplan.com and the 'Ohana Health Plan Provider Portal at www.ohanahealthplan.com/provider.

As mentioned, FWA training must be completed by December 31, 2009, so we urge you to complete the training promptly and avoid interruption of your contract with 'Ohana Health Plan.

Very truly yours,
Jonathan Rich, Chief Compliance Officer