

FDR

Newsletter

A Quarterly Guide to FDR Compliance

Anthem's First-tier, Downstream and Related Entities

2017 Kickoff (Q1)

Anthem 2017 Medicare FDR Oversight Kickoff

Welcome to Anthem's 2017 Medicare first tier, downstream and related entities (FDR) oversight kickoff! With a new year underway, the Medicare FDR Oversight Team wants to ensure you have all the necessary tools and documents to make 2017 a success for FDR oversight. Below you will find a description of the documentation and tools included in our 2017 Kick Off packet. If you have any questions regarding this information, please reach out to us at FDRSharedMailbox@anthem.com. We hope you have a great 2017. Happy New Year!

Anthem's Standards of Ethical Business Conduct & 2017 Ethics and Compliance Plan with Medicare Addendum

Compliance is everyone's responsibility and it is Anthem's job to communicate this critical message to our FDRs. We want to ensure everyone supporting Anthem Medicare members is aware of both our general principles and values when it comes to conducting business as well as the more detailed policies regarding our Medicare Compliance Program. Two of the ways we communicate this message is through Anthem's Standards of Ethical Business Conduct (SOEBC) and Anthem's Ethics and Compliance Plan.

- **The SOEBC** provides guidance on Anthem's commitment to and expectations of our FDRs to conduct business in an ethical and compliant manner.
- **The Ethics & Compliance Plan with Medicare Addendum** sets forth the principles, policies and procedures on how Anthem's associates, and our FDRs, are required to conduct business and themselves. Anthem's Ethics & Compliance Plan supports a culture of ethics and compliance and continuous improvement through an infrastructure that effectively prevents, detects and resolves issues and noncompliant conduct. It provides the knowledge and tools associates need to perform their jobs in a compliant manner, identify potential compliance issues and report suspected or known non-compliance as well as fraud, waste and abuse. The Medicare Compliance Plan Addendum attached to the Ethics & Compliance Plan provides additional detail and requirements specific to Anthem's Medicare business.

While it is Anthem's responsibility to communicate compliance expectations to our FDRs, it is the responsibility of our FDRs to ensure this information is provided to their employees. FDRs must use Anthem's SOEBC and Ethics & Compliance Plan with Medicare Addendum to ensure employees are aware of compliance expectations and requirements. However, FDRs may also choose to use comparable standards of conduct and compliance policies of their own. Whether using Anthem's materials or the FDR's own information, the standards of conduct and compliance policies must be distributed to FDR employees who support Anthem's Medicare business. Distribution must occur:

- within 90 days of hire (or contracting)
- annually thereafter; and
- when there are updates.

Helpful Compliance Links...

To review regulatory references to monitoring requirements:

 [CMS Medicare Managed Care Manual Ch. 11](#)

 [Medicare Managed Care Manual Ch. 21 & Prescription Drug Benefit Manual Ch. 9](#)

 [CMS Medicare Learning Network](#)

Continued on next page





Anthem's Standards of Ethical Business Conduct & 2017 Ethics and Compliance Plan with Medicare Addendum Continued –

FDRs may choose to distribute (or make available) this information in the most effective way for their organization. However, FDRs must maintain documentation to evidence standards of conduct and compliance policies were distributed (or made available) to employees. Examples of acceptable documentation include employee attestations (confirming receipt), emails showing documents were sent to all employees, or a screenshot of the company intranet site linking employees to standards of conduct/policies.

CMS' General Compliance & Fraud, Waste and Abuse Training (FWA) Information

Starting on January 1, 2016, CMS now requires all FDRs to utilize the training content, located on the CMS Medicare Learning Network ([MLN](#)), to satisfy the general compliance and FWA training requirements. CMS' trainings are titled – "*Medicare Parts C and D General Compliance Training*" and "*Combating Medicare Parts C and D FWA Training*". FDRs have the following options for complying with CMS training requirements:

1. FDRs can complete the general compliance and FWA web-based training modules located on the CMS MLN. Once an individual completes the training, the system will generate a certificate of completion. The MLN certificate of completion must be accepted by Sponsors as supporting documentation. Anthem's FDR Oversight Team has included a [CMS MLN Access Guide](#) in the 2017 Kickoff packet to help FDRs log on and access CMS' MLN system.
2. FDRs can download and incorporate the content of the CMS standardized training modules from the CMS website into their own organization's existing compliance training materials/systems. To assist FDRs, Anthem's FDR Oversight Team has included a copy of the downloaded content of [CMS' Medicare Parts C and D General Compliance Training](#) and [Combating Medicare Parts C and D FWA Training](#) in our 2017 Kickoff packet. These PDF versions are provided as a service to FDRs to incorporate the CMS training content into existing training systems and written documents and is not intended to take the place of the web-based training modules located on MLN. A training certificate is not provided with the PDF download. **Please note**, CMS updated the training modules for 2017, so please ensure your organization is utilizing the most current versions dated January 2017.

Although the training content cannot be modified, CMS will allow modifications to the appearance of the content (i.e. font, color, background, format, etc.). Additionally, organizations may enhance or wrap around the CMS training content by adding topics specific to their organization or the employee's job function.

In 2017 FDRs will be required to submit either copies of employee MLN training certificates or internal training certificates, and a signed attestation to confirm the organization has completed the appropriate general compliance and FWA trainings. CMS has indicated attestations must include language specifying the FDR complies with CMS compliance and FWA training requirements and the training provided to employees includes CMS content. To aid our FDRs, Anthem is providing our required [General Compliance & FWA Training Attestation](#) in our 2017 Kickoff packet.

Please do not forget -- even if a training attestation is submitted to Anthem, all FDRs must maintain documentation of training completion and furnish upon request (i.e. certificates of completion, training logs, system generated reports, spreadsheets, etc).





FDR Oversight – Tools You Can Use

Benjamin Franklin had a good point when he stated *“By failing to prepare, you are preparing to fail”*. With the notion of preparedness in mind, the Anthem Medicare FDR Oversight Team wants to ensure our FDRs have the information and tools needed to succeed in implementing and demonstrating an effective compliance program, and for participating in Anthem’s Medicare FDR Oversight Program. We have created a helpful tool kit containing the following information and tools:

- **FDR Oversight Program Overview** – This information provides FDRs with a high-level overview of Anthem’s FDR Oversight Program. It explains the regulatory requirements behind the Oversight Program, the processes utilized by Anthem to maintain oversight of our FDRs, and the methods for reporting a compliance and/or FWA issue to Anthem.
- **Policy and Procedure Templates** – To aid our FDRs in ensuring they have proper policies and procedures documented and implemented in 2017, we are providing templates which can be utilized for OIG and GSA Exclusion Screenings, General Compliance and FWA Trainings, and Record Retention.
- **2017 Offshore Attestation** – If an FDR subcontracts with an offshore vendor who has access to Anthem’s Medicare Protected Health Information (PHI), an Offshore Attestation must be submitted to Anthem as we are required to submit to CMS.
- **General Compliance & FWA Training Attestation** – FDRs should use this attestation to support their organization’s completion of general compliance and FWA trainings per CMS requirements.
- **Medicare Regulatory Exhibit (MRE)** – All FDRs contracted to support Anthem’s Medicare business are required to have an executed MRE as part of their contract. We have included a copy for your reference.
- **OIG & GSA Exclusion Screening Tracker Template** – This tool can be used by FDRs for tracking the required pre-hire and monthly employee screenings against the OIG and GSA exclusion listings. Please note – the tracker is a helpful tool; however, FDRs must also maintain supporting documentation to evidence the dates the employees were screened. Examples of supporting documentation include screenshots from the OIG and GSA websites showing the results of the employee search, or output reports from a third-party vendor or human resources department.
- **OIG & GSA Exclusion Screening Tips and Reminders** – When it comes to CMS requirements, Federal Exclusion Screenings is the most common topic in which Anthem receives questions from our FDRs. This tip sheet will help FDRs in ensuring they have proper Federal Exclusion Screening processes in place. It provides reminders on what is required for screenings, which associates need to be screened (i.e. All employees, including temporary workers, interns, volunteers, contracted workers, and downstream contractors/vendors), and what supporting documentation must be maintained by FDRs to evidence compliance.
- **FDR Disciplinary Actions Information Form** - This form is intended to solicit additional detail regarding disciplinary actions received by the FDR or FDR employees for violations of standards of conduct, non-compliance with Medicare requirements and/or incidences of FWA as reported on the FDR Annual Monitoring Survey.
- **Anthem Methods of Reporting Compliance/FWA Issues** – This document serves as a helpful tip sheet on the different methods for reporting a compliance and/or FWA issue to Anthem.

FDR Oversight – Tools You Can Use Continued -

- **FDR Audit Readiness** – This document serves as a helpful guide for FDRs to utilize to ensure their organization is prepared and ready in the event of a regulatory audit. This includes providing universe data by FDRs supporting Anthem’s utilization management and claims functions. FDRs can find CMS’ 2017 Draft Audit Protocols at the following link: [CMS Audit Protocols](#).
- **Ariba System Information & Tips** – This provides useful and helpful tips on the Ariba System, which is used by Anthem to issue the annual FDR Monitoring Survey. FDRs utilize the Ariba system to respond to the annual FDR Monitoring Survey and submit required documentation to confirm compliance with CMS requirements.

FDR Oversight Clinic

Are you a new Anthem Medicare FDR? Do you have questions on how to complete Anthem’s FDR Monitoring Survey via the Ariba system? Are you wondering what type of documentation is needed to close out your open remediation items? If you have any questions surrounding Anthem’s FDR Oversight Program, including our monitoring and auditing processes, please join us at an upcoming FDR Oversight Clinic. The Clinic is a monthly meeting hosted by the Anthem FDR Oversight Team where we provide an overview of the Oversight Program, review the monitoring process, and provide helpful information and tips related to Ariba, the web-based system we utilize to issue the annual FDR Monitoring Survey. Reach out to the FDRSharedMailbox@anthem.com, and we will send you the invitation for an upcoming Clinic!

Upcoming FDR Oversight Clinic Meetings*:

Wed. February 8, 2017

Wed. March 8, 2017

Wed. April 12, 2017

*Please note, in the event a Clinic Meeting is moved to a new date, the FDR Oversight Team will notify all invitees.

There are several ways to report violations:

- Anthem’s Fraud Hotline: **1-866-847-8247**
- Anthem’s Ethics and Compliance Helpline: **1-877-725-2702**
- Ethics & Compliance E-mail box: ethicsandcompliance@anthem.com
- Send a letter to: **Post Office Box 791
Indianapolis, IN 46206**
- You may report an issue to your Anthem contact (Business Owner) or directly to:

Sarah Lorange, Vice President of Compliance, Medicare

Sarah.J.Lorange@anthem.com, 303-764-7277

700 Broadway, Denver CO 80203 MedicareProgramsCompOfficer@anthem.com

**How to Report Compliance
and/or Fraud, Waste and
Abuse Issues**

** Anthem enforces a strict policy of non-retaliation. Retaliation against anyone who reports compliance issue in good faith is strictly prohibited, including reports made by contracted vendors (FDRs). If you see retaliation or believe it has occurred, you must report it.*



Questions? Please send us an email: FDRSharedMailbox@anthem.com