

## Compliance Training, Policies & Exclusion Screening FAQs

Why do I have to do these CMS required trainings and screenings?

CMS requires FDRs who do business with Medicare Advantage plans to receive annual compliance training and information on our compliance program, and be screened against the exclusion lists. This is also a requirement in your Meridian contract.

What if I have administered compliance training and compliance program and screened my employees for another Medicare Advantage plan?

If you have already administered compliance training and screened your employees for another Medicare Advantage plan, you do not have to repeat the training or screening. Retain evidence of both, as you may be audited later. You must still review Meridian's Compliance Program, as this is company specific information.

Can I develop my own training for my employees to meet CMS requirements?

No. Only accepted trainings are developed by us, another Medicare Advantage plan using CMS-approved modules, or by CMS through its Medicare Learning Network (MLN) (www.cms.gov, search for "MLN Provider Compliance"). You may develop supplemental internal training. You may develop your own modules to provide your employees with specific, on-the-job training. You may also develop additional supplemental internal training to supplement the General Compliance and FWA Training content, but it cannot replace them.

Who in my organization is required to take compliance training, review the compliance program and be screened?

All employees who handle our Medicare business must take the training, be familiar with our compliance program, and be screened against the exclusion list.

Do I need to send documentation to Meridian to show I have completed these activities?

No. You should document completion of the training, review of our compliance program, and screening. This documentation must be retained for a period of 10 years. We provide a Training Attendance Log on our website to track completion. Please retain documentation for your record, as we may audit this later.

Are the training, compliance program review and screenings required for new employees? Yes. New employees must receive the training, information on our compliance program, and be screened, typically at the time of their orientation.

When is the deadline to finish compliance training, compliance program review and screening? Your employees must complete the training and review the compliance program by September 20, 2015. Screening must be done before the employee is hired and monthly thereafter.

What is the purpose of compliance training and reviewing Meridian's Compliance Program? They will provide you with an understanding of our Compliance Program, examples of non-compliant and FWA issues, an explanation of your obligation to recognize non-compliance, FWA, and when and how to report both and testing of your knowledge of compliance.

What is the purpose of the exclusion screening?

Screening ensures that certain employees who are disqualified from working in Medicare, as determined by the government do not perform any work for us.

What must I do if an employee is listed on the exclusion list?

If any person is found to be on an exclusion list, you are required to immediately remove them from any work related directly or indirectly to Federal health care programs, including Medicare.





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Where are the training modules, compliance program and exclusion lists located?

- CMS-approved compliance training and Meridian Compliance Program: <a href="www.medicaremeridian.com">www.medicaremeridian.com</a>,
   select state, and then line of business. Navigate to "Corporate" home page. Click "Medicare Compliance"
- CMS Medicare Learning Network (MLN) website: www.cms.gov, search for "MLN Provider Compliance"
- OIG exclusion: http://oig.hhs.gov/exclusions/index.asp
- GSA exclusion: www.sam.gov/portal/public/SAM/

How often are the training modules and Meridian's Compliance Program updated? Our materials are reviewed and updated at least annually.

