



A Quarterly Guide to FDR Compliance

Anthem's First-tier, Downstream and Related Entities

2018 Kickoff (Q1)

Anthem's 2018 Medicare FDR Oversight Kickoff

Welcome to Anthem's 2018 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 2018 a success for FDR oversight. Below you will find a description of the documentation and tools included in our 2018 Kickoff packet. If you have any questions regarding this information, please reach out to us at FDRSharedMailbox@anthem.com. We hope you have a great 2018!

Anthem's Standards of Ethical Business Conduct & 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, more detailed policies regarding our Medicare Compliance Program. One 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 expectation 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 & 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](#)) website 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 2018 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 organizations' 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 2018 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 has not updated the training modules since 2017, so please continue to utilize the current versions dated January 2017.

Although the training content cannot be modified, CMS will allow modifications to the appearance of the content (e.g. 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 2018, FDRs will be required to submit copies of employees' training certificates (*or applicable training support document*) and a signed Anthem Training attestation to confirm the organization has completed the appropriate general compliance and FWA trainings. To aid our FDRs, Anthem is providing our required [General Compliance & FWA Training Attestation](#) in our 2018 Kickoff packet.

Please do not forget -- All FDRs must maintain documentation of training completion and furnish upon request during Anthem's annual monitoring review (e.g. 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 2018, we are providing templates which can be utilized for OIG and GSA Exclusion Screenings, General Compliance and FWA Trainings, and Record Retention.
- **2018 Offshore Attestation** – If an FDR has an offshore location, or 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.
- **Anthem’s 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. This will be required for submission during your annual monitoring review.
- **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 Requirement Overview** – When it comes to CMS requirements, Federal Exclusion Screenings is the most common topic in which Anthem receives questions from our FDRs. This reference document 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 examples of supporting documentation that 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 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’ 2018 Audit Protocols at the following link: [CMS Audit Protocols](#).
- **Ariba System New User Access Guide** – This provides useful and helpful tips on the Ariba System, which is used by Anthem to issue the annual FDR Monitoring Survey.

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*:

February 21, 2018

March 14, 2018

April 11, 2018

*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**
- Anthem's Ethics and Compliance online tool: **www.anthemethicshelpline.com**
- 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

** 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.*

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



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