

## 2009 Medicare Part C & Part D Community Provider Specialized Training Discussion Document

### Key Points:

**Who:** All providers contracted with Lovelace Health Plan (LHP), Lovelace Insurance Company, Inc. (LINC), Presbyterian Health Plan (PHP), Presbyterian Insurance Company, Inc (PIC), Blue Cross Blue Shield of New Mexico (BCBSNM) or Blue Cross Blue Shield of Texas (BCBSTX) to provide services under a Medicare Part C (Medicare Advantage) or Medicare Part D (Prescription Drug) plan.

**What:** Fraud, Waste and Abuse training.

**When:** By October 31, 2009 for providers contracted to provide services during 2009.

**Where:** [www.NMCHILI.org](http://www.NMCHILI.org)

**Why:** It's mandated by the Medicare Advantage and Medicare Prescription Drug Program regulations (see cites in Q&A).

1. Q: Why did I receive information from Lovelace Health Plan (LHP), Lovelace Insurance Company, Inc. (LINC), Presbyterian Health Plan (PHP), Presbyterian Insurance Company, Inc (PIC), Blue Cross Blue Shield of New Mexico (BCBSNM) and Blue Cross Blue Shield of Texas (BCBSTX) about this training requirement? I don't contract with all of these health plans.

A: To simplify the training for the many providers who contract with one or more of these health plans, the plans have come together to present a single training program. You can receive credit for completing this training from any of these plans that you may contract with by checking the plan name(s) on the attestation at the end of the training course. While we may be competing health plans, we all view fraud, waste and abuse as a serious risk and we feel strongly that it is important to present a united front to our providers.

2. Who needs to complete the Medicare Part C & Part D training?

A: Lovelace Health Plan (LHP), Lovelace Insurance Company Inc. , Presbyterian Health Plan (PHP), Presbyterian Insurance Company, Inc (PIC), Blue Cross Blue Shield of New Mexico (BCBSNM) and Blue Cross Blue Shield of Texas (BCBSTX) have entered into individual contracts with the Centers for Medicare & Medicaid (CMS) offering the Medicare Advantage-Prescription Drug program (MA-PD). As MA-PD program sponsors, we are responsible for ensuring that all contracted providers are aware of risk areas and/or program requirements regarding potential fraud, waste and abuse (FWA).

3. Q: Where can I find the Part C & Part D program requirements?

- A: There are three specific references that contain this information.
- FR Doc. 07-5946 (72 FR 68700 through 68741).
  - 42 CFR § 423.504.
  - Prescription Drug Benefit Manual Chapter 9: Program to Control Fraud, Waste and Abuse.

4. Q: Do pediatricians need to complete this training?

A: If there a possibility that a pediatrician may provide services for a child who qualifies for Medicare benefits (i.e., disabled) then the pediatrician must complete the training.

5. Q: Where I can obtain the training material and the attestation form on line?

A: The training material and the attestation form may be found on the website:  
[www.NMCHILI.org](http://www.NMCHILI.org)

6. Q: What can I do to obtain the training material if I do not have internet access?

A: You may contact the following to request a hard copy of the training material and the attestation form and instructions for submitting the attestation.

PHS & PIC - Tim Gonzales, Provider Services Coordinator – 505-923-8374 or [TGonzales@phs.org](mailto:TGonzales@phs.org)  
BCBSNM - Cathie Rowland-Robert, Sr. Network Representative - 505-816-2132, [Cathie\\_Rowland-Robert@bcbsnm.com](mailto:Cathie_Rowland-Robert@bcbsnm.com)  
BCBSTX - Tracey Hodge, Professional Provider Network Representative - 713-354-7685, [Tracey\\_Hodge@bcbstx.com](mailto:Tracey_Hodge@bcbstx.com)  
LHP & LINC – Lupe Chavez - 505-727-5524 or [Lupe.Chavez@lovelace.com](mailto:Lupe.Chavez@lovelace.com)

7. Q: When does this training need to be completed?

A: The deadline for completing the training and submitting the signed attestation is October 31, 2009

8. Q: Who do I contact with any questions I may have?

A: PHS & PIC - Mark Sanchez, Provider Services Training Specialist – 505-923-8066 or [MSanchez@phs.org](mailto:MSanchez@phs.org)  
BCBSNM - Cathie Rowland-Robert, Sr. Network Representative - 505-816-2132, [Cathie\\_Rowland-Robert@bcbsnm.com](mailto:Cathie_Rowland-Robert@bcbsnm.com)  
BCBSTX - Tracey Hodge, Professional Provider Network Representative - 713-354-7685, [Tracey\\_Hodge@bcbstx.com](mailto:Tracey_Hodge@bcbstx.com)  
LHP & LINC – Lupe Chavez 505-727-5524 or [Lupe.Chavez@lovelace.com](mailto:Lupe.Chavez@lovelace.com)

9. Q: Blue Cross Blue Shield of New Mexico and Blue Cross Blue Shield of Texas told me that I had until December 31, 2009 to meet this requirement. Why are you saying I only have until October 31, 2009?

A: Initially, Blue Cross Blue Shield did communicate December 31 as the due date; however, when the partnership with the other plans developed we decided jointly that October 31 should be the cut off date so that we would have adequate time to follow up with any providers who failed to meet the requirement.

10. Q: Blue Cross Blue Shield of New Mexico and Blue Cross Blue Shield of Texas are exiting the MA-PD program at the end of this year so why do I have to complete this training?

A: This requirement applies to the 2009 plan year and since you may provide services to subscribers during this period CMS regulation mandate that you complete this fraud, waste and abuse training during 2009.

Although Blue Cross Blue Shield of New Mexico and Blue Cross Blue Shield of Texas are exiting the MA-PD program beginning 2010, this training does apply to all contracted providers who do business with Medicare Part C and Part D Health Plans in the community during 2009.

11. Q: What happens if I don't complete this requirement?

A: Plan sponsors are required to provide Fraud, Waste and Abuse training to providers. As a contracting provider you are required to meet this training requirement in order to remain in the network.

12. Q: What if I have already completed the training provided by another plan sponsor that I contract with? Do I need to complete your training, too?

A: If you have already completed the training program provided by another plan sponsor, we will give you credit for meeting this requirement. Go to the attestation and click on the check box "Other" and enter the name of the plan sponsor in the box provided.

13. Q: Can I use a fraud, waste and abuse training program that I purchased or created to meet this requirement?

A: CMS requires that plan sponsors make Fraud, Waste and Abuse training available to their providers. The guidance specifically states that you should not create your own training. We recognize that many organizations may already require Fraud, Waste and Abuse training of their employees. As long as the training was not purchased or created specifically to meet this requirement you may receive credit for completion by clicking on the check box "Other" on the attestation and explaining in the box provided.

14. Q: How much time can I expect to spend taking this training?

A: This training will take approximately 45 minutes to complete.

15. Q: Do I need to complete the Part C and Part D training if I am not a prescribing provider?

A: Yes. Based on a review of the Part C and Part D regulations it has been determined that all contracted providers, not just prescribing providers, must complete this training. This information is different from the information provided earlier this year for LHP, LINC, PHP & PIC providers.

16. Q: If I completed previous 2009 training from LHP, LINC, PHP or PIC, do I need to complete this training?

A: No. LHP, LINC, PHP, & PIC will share information received to date with all Health Plans participating in this joint training program. You do not need to retake the 2009 training.