From: Teresa Lively [mailto:tlively1@humana.com]
Sent: Friday, August 28, 2015 10:12 AM
To: Humana Partner Compliance
Subject: Humana FDR Compliance Tool Kit Now Available

Hello,

You are receiving this email because you have been identified as the compliance contact for an FDR of Humana. This email is intended to make you aware of a new set of resources to support our FDR partners with compliance program requirements. Below is a table of contents.

Table of Contents		
Item	**Compliance Resource Tool**	**Description**
Information		
1	Medicare Managed Care Manual	Link to the Medicare Managed Care Manual Chapter 21 – Compliance Program Guidelines and Prescription Drug Benefit Manual Chapter 9 - Compliance Program Guidelines
2	CMS FWA-GCT_Final	Power point presentation of CMS Fraud Waste and Abuse and General Compliance training module.
3	FDR Compliance Program Requirements	Provides definition of FDR and outlines the Humana and CMS requirements for FDR compliance in easily understood language.
4	Resource Links	Hyperlinks to commonly used compliance resource links: - CMS Medicare Managed Care Manual Chapter 21 Compliance Program Guidelines and Chapter 9 Compliance Program Guidelines. - CMS Medicare Learning Network (MLN) Provider Compliance. Contains educational resources that inform health care professionals on how to avoid improper activities when dealing with various CMS Programs. - Medicare Parts C and D Fraud, Waste and Abuse Training and Medicare Parts C and D General Compliance Training. CMS approved training. - Office of the Inspector General Exclusion Database (OIG) for monthly screening. - System for Award Management (SAM) (fka GSA) for monthly screening.
5	FAQ	A list of frequently asked questions from Humana's FDRs specific to Humana's

		requirements and process.
6	FDR Compliance Acronyms	A list of common compliance acronyms and their definitions.

Templates		
7	Policy Format Template	A template that can be used to create internal policies to support compliance program requirements. This template can be used and edited as needed by external partners.
8	Policy Template - Exclusion Screening	A template that can be used to create an internal policy to support OIG and SAM (GSA) exclusion screening requirements. It includes provisions for who must be screened, frequency, action to take if exclusion is found and retention of screening evidence. This template can be used and edited as needed by external partners.
9	Employee Training and Screening Tracker Template	A template for tracking the completion of required FWA, General Compliance and Standards of Conduct training at time of hire and annually thereafter. Also enables tracking of OIG and SAM (GSA) screenings at time of hire and monthly thereafter.
10	Conflict of Interest Template	Guidance document that serves as a template of a Conflict of Interest Policy and Employee Attestation. This can be used and/or modified as needed.
11	FDR Compliance Program Audit Tool and Checklist Template	A template for auditing against compliance program requirements and tracking the required components of a compliance program. Includes provisions for the specific location/document that evidences the requirement is met.
12	Compliance Program Audit Corrective Action Template	A template to use for corrective action notification as a result of auditing FDRs against the CMS compliance program requirements.

Guidance Documents and Examples		
13	Overview Guidance Document for Screening Against Government Exclusion Lists	Guidance overview for exclusion screening: data sources, frequency of screening, and who to screen.
14	Humana Compliance Policy for FDRs	Provides an example of a Compliance Policy and the various subject matter that should be contained therein.
15	Humana Ethics Every Day for FDRs	Provides an example of a Code of Conduct and the various subject matter that should be contained therein.
16	Poster - Reporting noncompliance or potential fraud, waste, and abuse (FWA) to Humana	Poster provides ways for reporting issues that impact Humana, directly to Humana. To be shared throughout FDR organization so employees know how to report concerns. FDR must report suspected or detected non-compliance or potential FWA that impact Humana to Humana.

We will be happy to share any of this information with you. All you need to do is submit a request to partnercompliance@humana.com. Please indicate the documents you wish to receive or provide the compliance requirement that you are trying to meet. Additionally, if you have questions or concerns, please send an email to partnercompliance@humana.com.

Our intent is to continue to educate and support our FDRs as we collaboratively drive towards greater compliance. We welcome any suggestion on what else might be valuable to include or otherwise improve the Tool Kit.

Thank you,

Teresa R. Lively

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