

**From:** Thelma Fullmer [<mailto:TFullmer@gatewayhealthplan.com>]  
**Sent:** Friday, October 30, 2015 5:44 PM  
**To:** FDRCommunications  
**Subject:** 2016 Compliance & Fraud, Waste & Abuse Training Requirement - Gateway Health FDR Communication - 2015 Volume 10 (October)

Per the Centers for Medicare & Medicaid Services (CMS) Prescription Drug Benefit Manual & Medicare Managed Care Manual, Chapters 9 & 21 respectively, Sections 50.3.1 & 50.3.2, Gateway Health<sup>SM</sup> (Gateway) is required to do the following:

- “Sponsors must ensure that general compliance information is communicated to their First Tier, Downstream & Related Entities (FDRs).”
- “The sponsors employees (including temporary workers and volunteers), and governing body members as well as FDRs employees who have involvement in the administration or delivery of Part C and D benefits must, at a minimum, receive FWA training within 90 days of initial hiring (or contracting in the case of FDRs), and annually thereafter.”

In June of 2015, Gateway Health<sup>SM</sup> sent an email communication to FDRs regarding CMS' January 1, 2016 mandatory use of the Medicare Learning Network (MLN) content for required General Compliance and Fraud, Waste and Abuse trainings. Subsequent to Gateway's email communication, CMS issued the attached memorandum.

Please carefully read the attached CMS memorandum as it includes important details about the training requirements as well as the requirement to produce a certificate of completion, or an attestation confirming that the organization has completed the appropriate compliance and FWA training to the health plan upon request.

Gateway is required to validate that the general compliance and FWA training requirements are completed by our delegates. More information about this validation will be provided in 2016.

If you have questions regarding this CMS update, please contact Gateway at:  
[MedicareComplianceOfficer@GatewayHealthPlan.com](mailto:MedicareComplianceOfficer@GatewayHealthPlan.com)

You received this email from [MedicareComplianceOfficer@GatewayHealthPlan.com](mailto:MedicareComplianceOfficer@GatewayHealthPlan.com) because CMS requires ongoing communication between Gateway's Medicare Compliance Officer and FDRs to raise

awareness of potential compliance issues and risks to organizations. This is the **tenth** communication sent this year. Please share this communication with your staff and downstream entities.

**Angela Jackson**

**Medicare Compliance Officer**

**Gateway Health<sup>SM</sup>**

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Thank You

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