

General Compliance and Fraud Waste and Abuse (GCFWA) Training and Education and Provider Attestation Requirements

Frequently Asked Questions (FAQs) Instructions to Complete Attestation Form

1. Why is a General Compliance and FWA Attestation required to be submitted to CHPW?

Community Health Plan of WA (CHPW) is required by contract with the Centers for Medicare & Medicaid Services (CMS) and the Washington State Health Care Authority (HCA) to ensure its contracted provider network completes General Compliance and Fraud, Waste, and Abuse (FWA) Training, within 90 days of contract, and annually thereafter. CHPW is required to maintain evidence that its contracted providers have completed training and must make available to the applicable state and federal agency, upon request.

2. If your group is contracted with Medicare A or B, do you need to submit an Attestation?

As stated by CMS, there is one exception to the FWA training and education requirement. Regulations effective June 7, 2010 implemented a “deeming” exception which exempts Providers who are enrolled in Medicare Part A or B from annual FWA training and education. Therefore, if an entity or an individual is enrolled in Medicare Part A or B, the FWA training and education has already been satisfied *and your Attestation would only apply to General Compliance.*

3. Who is required to receive this training?

All staff – including your CEOs, senior leaders, managers, clerical/admin staff, physicians and other clinical staff.

4. How often is a General Compliance and FWA (GCFWA) training required?

CMS requires General Compliance and Fraud, Waste and Abuse (GCFWA) training to be completed at least once a year and made part of the orientation process for new employees. **Note:** See deeming exception for FWA in #2 above.

5. When do we need to submit a GCFWA Attestation to CHPW:

- **New CHPW Providers:** Within 90-days of a fully executed contract with CHPW and **annually** thereafter.
- **Established Network Providers:** If you have not submitted an Attestation in the past 12-months, you must do so immediately and **annually** thereafter.

NOTE: Your Attestation must be signed/dated the year that it is due. For example, if you submit your Attestation on June of 2016 and you submit your Attestation again in Dec of 2016 to cover 2017, the system will show two Attestations for 2016 and none for 2017.

6. Are we required to use CMS’s and/or CHPW’s GCFWA training materials or can we use our own?

CMS suspended (until further notice) the requirement that would have been effective January 1, 2016; where Providers must use General Compliance and FWA (GCFWA) Training courses available on the CMS MLN website at:

<http://www.cms.gov/MLNProducts>

Please note that your training courses must meet CMS standards and requirements and should mirror the content on the MLN training course.

7. Is there a link that will take me directly to the GCFWA training course on the MLN?

Go to: <http://www.cms.gov/MLNProducts> and scroll down to “Downloads” and click on “Medicare Part C and D Fraud, Waste, and Abuse and Medicare Parts C and D General Compliance Training.”

Your inquiries for the Medicare Learning Network (MLN), could be directed via e-mail at MLN@cms.hhs.gov

8. How to complete a General Compliance/FWA (GCFWA) Attestation Form:

The information on the attestation form is straightforward and simple. The form must be completed by entering information requested in all fields; handwriting must be legible and the form must be signed and dated. See #9 below for instructions on how to submit the form to CHPW.

9. How do I submit a completed General Compliance and FWA Attestation Form to CHPW?

Fill out the form and submit online: <https://portal.chpw.org/forms/provider#/gcfwa>

Submit completed forms via:

Fax: 206-613-5018, ATTN: PROVIDER RELATIONS

E-mail: Send a scanned copy to Provider.Relations@chpw.org

USPS: Community Health Plan of Washington
C/O Provider Relations 1111 Third Ave, Ste. 400
Seattle, WA 98101

Should you have any additional questions or concerns, please contact your Provider Relations Representative directly or send an email to Provider.Relations@CHPW.org. Please type **GCFWA** in the “subject” line.

What should I do if I suspect fraud, waste, or abuse or other compliance issues?

- Contact CHPW Customer Service at 1-800-440-1561, *or*
- CHPW Medicare Advantage Customer Service at 1-800-942-0247, *or*
- Submit a report in writing to Compliance.Officer@chpw.org or by fax at 206-652-7017. You could access Compliance Reporting Forms at www.chpw.org.
- Contact the appropriate state or federal agency to submit a report, including CMS at 1-800-MEDICARE; Washington State Health Care Authority (HCA) at 1-800-562-6906; or the Office of Inspector General (OIG) at 1-800-HHS-TIPS (1-800-447-8477).

Please note the following acronyms, terms and definitions:

- **CMS** – Centers for Medicare and Medicaid Services
- **HCA** – Health Care Authority
- **MA** – Medicare Advantage
- **CEO** – Chief Executive Officer
- **CHPW** – Community Health Plan of WA
- **FWA** – Fraud, Waste and Abuse
- **MLN** – Medicare Learning Network
- **GCFWA** – General Compliance, Fraud, Waste and Abuse