



Action Required Regarding 2021 CMS Mandatory Trainings

Dear Provider:

The Centers for Medicare and Medicaid Services (CMS) require that Medicare Advantage Organizations (MAO) inform network providers and practitioners about the requirements to complete annual training. In 2021, the required trainings are:

- General Compliance (Compliance)
- Fraud, Waste and Abuse (FWA) *
- Model of Care (MOC)

For General Compliance and Fraud, Waste and Abuse*, effective January 1, 2021, contracted providers, practitioners and First-Tier, Downstream, and Related Entities (FDR) employees who are in critical roles related to any delegated functions are required to complete training via the Medicare Learning Network (MLN) website. The trainings must be completed by each individual provider/practitioner within the group rather than one person representing the group collectively. In addition, if an FDR is contracted to perform delegated functions (i.e., claims processing, utilization management, or credentialing), then training must be completed by those fulfilling the following roles:

- Senior administrators or managers directly responsible for the FDR/delegated entity's contract with the MAO, such as senior vice president, departmental managers or chief medical officer;
- Individuals directly involved with establishing and administering any administrative function, such as claims processing, credentialing or utilization management, and/or medical benefits coverage policies and procedures, on Michigan Complete Health's behalf;
- Individuals involved with decision-making authority on behalf of Michigan Complete Health, such as clinical decisions, coverage determinations, credentialing, or processing of medical claims;
- Reviewers of beneficiary claims and services submitted for payment; or
- Individuals with job functions that place the FDR/delegated entity in a position to commit significant noncompliance with CMS program requirements or health care FWA.

Training must be completed within 90 days of contracting, hiring, or becoming a delegated entity and annually thereafter. Once training is complete, each applicable entity will need to complete the certificate(s) of completion or attestation through the CMS MLN and provide a copy to the health plan.

**Note: Providers, practitioners, and FDRs/delegated entities deemed to have met the FWA training and education certification requirements through enrollment into Parts A or B of the Medicare program or through accreditation as a supplier of DMEPOS are exempt from the FWA training requirement only (General Compliance training remains a requirement).*

To complete Compliance and FWA training (if applicable) and access your certificate of completion:

- Visit the CMS MLN site:
 - To access training, use the following link and refer to the "Downloads" section of the webpage:
<https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/ProviderCompliance.html>
(see: [Medicare Parts C and D Fraud, Waste, and Abuse Training and Medicare Parts C and D General Compliance Training](#))

To report Fraud, Waste and Abuse, please call our hotline at (866) 685-8664.

Please provide Michigan Complete Health a copy of each certificate of completion:

Email to: contracting@michigancompletehealth.com

Fax to: 844-276-9874

Mail to: 1 Campus Martius, Suite 700
Detroit, MI 48226

For Model of Care (MOC), the health plan's training should be accessed at <https://www.michigancompletehealth.com/providers/resources/model-of-care-training.html>. Once the training is completed, please fill out the attestation form located at the end of the presentation. Attestation forms can be submitted by completing the form online (through the portal) or by fax, mail/email using the contact information provided above. Please note that when you complete the MOC attestation, include all of tax identification numbers (TINs) that you are representing.

2021 – Summary of Training Requirements:

Training	Training Location	Signed Attestation(s) From	Attestation Method
General Compliance	CMS MLN	Representative may attest for group or organization (TIN level) or each applicable provider, practitioner, administrator (entities classified as FDR). Note: If done at the organization (TIN) level, the organization is responsible for keeping the documentation at the NPI level and providing upon request.	Send attestation or copy of CMS certificate of completion to health plan
Fraud, Waste and Abuse	CMS MLN	Representative may attest for group or organization (TIN level) or each applicable provider, practitioner, administrator (entities classified as a FDR provided they are not exempt - see *Note on first page). Note: If done at the organization (TIN) level, the organization is responsible for keeping the documentation at the NPI level and providing upon request.	Send attestation or copy of CMS certificate of completion to health plan
Model of Care	Health plan's website	Representative may attest for group or organization (TIN level); organization is responsible for maintaining the documentation and providing upon request. For training in group settings, the group or organization is responsible to keep sign in sheets for all providers/practitioners attending.	Submit through portal or fax, mail, email to health plan

Michigan Complete Health is committed to working with you to fulfill these CMS requirements. If you need additional information, please feel free to contact Provider Relations at 1-844-239-7387.

Thank you for your participation; we look forward to being your partner in care to Medicare beneficiaries.

Sincerely,

Michigan Complete Health

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