



An Independent Licensee of the
Blue Cross and Blue Shield Association

September 2018

Important Reminder for Medicare Advantage Providers **Review Policies for Preventing Medicare Fraud, Waste and Abuse**

In order to continue to serve our customers in a manner that reflects the highest level of integrity and ethical business conduct, we are required by the Centers for Medicare & Medicaid Services (CMS) to share our standards of conduct with – and provide education and training to – our first tier¹, downstream and related entities (FDRs). We are also required to ensure FDRs adhere to these standards and meet education and training requirements and/or that FDRs adopt and follow a code of conduct particular to their own organization. This should reflect a commitment to detecting, preventing and correcting noncompliance with Medicare requirements in the delivery of Medicare services. You must complete general compliance and fraud, waste and abuse training, and if applicable, specialized Medicare fraud, waste and abuse training.

We encourage you to review our [Compass Code of Ethical Business Conduct](#), which contains the principles and values by which we operate. You may adopt it as your own or adopt a similar program for your practice, and comply, at a minimum, with those elements described at 42 CFR §§ 422.503(b)(4)(vi)(A) and 423.504(b)(4)(vi)(A). You will find our Compass Code of Ethical Business Conduct, along with frequently asked questions and links to CMS's Medicare Parts C&D Fraud, Waste and Abuse and General Compliance Training and the Office of Inspector General (OIG) and General Services Administration (GSA) exclusion lists on [floridablue.com](#) in the *About Us* section, select *Ethics and Compliance*. This information can also be found in the [Ethics and Compliance](#) section under the *Providers* tab on [floridablue.com](#). We will check with you in the fall of 2018 to determine your progress with these CMS requirements.

Additionally, the website also contains our Compliance & Ethics [policy](#), which includes a link to [EthicsPoint](#), a third-party vendor that provides you with a confidential, easy-to-use tool to contact the Florida Blue Business Ethics, Integrity & Compliance Division to ask questions or report fraud, waste and abuse. You have the option to remain anonymous when filing a report.

If you have questions, please contact our Business Ethics, Integrity & Compliance Division at 800-477-3736 ext. 56300. You may also contact our Special Investigation Unit Fraud Hotline at 800-678-8355.

¹First Tier Entity is any party that enters into a written arrangement acceptable to CMS, with a Medicare Advantage Organization or Part D plan sponsor or applicant to provide administrative services or health care services to a Medicare eligible individual under the MA program or Part D program. (See, 42 C.F.R. § 423.501).