



August 26, 2016

RE: 2016 Fraud, Waste, and Abuse & General Compliance Training

Dear Administrator:

In accordance with Knox-Keene Health Care Service Plan Act of 1975, Section 1348
– **AntiFraudPlan:**

(a) Every health care service plan licensed to do business in this state shall establish an antifraud plan. The purpose of the antifraud plan shall be to organize and implement an antifraud strategy to identify and reduce costs to the plans, providers, subscribers, enrollees, and others caused by fraudulent activities, and to protect consumers in the delivery of health care services through the timely detection, investigation, and prosecution of suspected fraud. The antifraud plan elements shall include, but not be limited to, all of the following: the designation of, or a contract with, individuals with specific investigative expertise in the management of fraud investigations; training of plan personnel and contractors concerning the detection of health care fraud; the plan's procedure for managing incidents of suspected fraud; and the internal procedure for referring suspected fraud to the appropriate government agency.

(e) For purposes of this section, "fraud" includes, but is not limited to, knowingly making or causing to be made any false or fraudulent claim for payment of a health care benefit.

As part of our Anti-Fraud Plan compliance program requirements, Care1st Health Plan is requiring all its contracted entities or its first-tier, downstream and related entities (FDRs) to complete Fraud, Waste, and Abuse (FWA) and General Compliance Training. This training, must, at a minimum, must be completed within 90 days of initial contracting, and annually thereafter. Training must also be provided:

- Upon appointment to a new job function;
- When requirements change;
- When FDRs are found to be noncompliant;
- As a corrective action to address a noncompliance issue; and

- When FDRs work in an area implicated in past FWA.

Care1st Health Plan must provide the FWA & General Compliance Training directly to its contracted FDRs or provide appropriate training materials.

Please note that for providers (Primary Care Physicians and Specialists), they are exempt from the FWA training but NOT the General Compliance training.

Attestation:

Please complete, sign, and return the FWA and GC Attestation to Care1st Health Plan within 30 calendar days from the receipt of the notice and training materials. Email to:

MPTran@care1st.com, SMcGongle@care1st.com, and JEisenberg@care1st.com or to ComplianceDepartment@care1st.com.

Care1st Health Plan will update and provide additional training materials and/or information as it deems necessary in accordance with regulatory requirements / guidelines.

We thank you for your continued support and we appreciate your cooperation. Please contact **Janet F. Eisenberg, M.S., CHCO, CFE, Associate Vice-President (AVP) of Corporate Compliance and Special Investigation Unit (SIU), at extension 6476, or Michael P. Tran, Compliance Supervisor, at extension 3326, if you have any questions or need any assistance.**

**Best Regards,
Corporate Compliance Office**