

2016 Medicare Fraud, Waste and Abuse (FWA) & General Compliance Training Log Completion

Network Pharmacy Provider NAME: _____ NCPDP#: _____

List All Training Materials Provided & Attach a Copy or Copies to this Log:

Employee First Name	Employee Last Name	Employee Title	Dates of Employment	Date Completed	Passing Scores

- Note:
- CMS requires Network Pharmacy Providers to maintain records demonstrating compliance with these requirements for ten (10) years (i.e. training program completion/attendance logs in an easily accessible location).
 - Do not send to OptumRx for storage-purposes.
 - For audit-purposes, requested records require a short turnaround time by CMS, OptumRx or our client plan sponsors.
 - In our experience, Auditors expect us to provide this information the same day of request and we greatly appreciate your cooperation.
 - Include all individuals names and the date the FWA and general compliance training information is provided/completed, as well as the date of the Office of Inspector General's (OIG) U.S. Department of Health & Human Services (HHS)/General Services Administration (GSA) monitoring review.
 - CMS will accept an attestation confirming that the organization has completed the appropriate compliance and FWA training. Attestations must include language specifying the entity complies with CMS compliance and FWA training requirements; the training provided includes CMS content without modification. In addition, it must include *at least* employee names, dates of employment, dates of completion, passing scores (if captured) to clearly document training completion as per CMS memo dated 6/17/2015
[\(LINK TO ATTACHED MEMO BELOW\)](#)



2015 06 17 2016
Compliance and FWA