

# FOCUS NEWS

## Take Action on Required Compliance Trainings!

The Centers for Medicare and Medicaid Services (CMS) requires Medicare Advantage (MA) Organizations and Part D Plan Sponsors to communicate with and provide training to their contracted Agents (including FMO Agents and ICAs) and vendor Telesales agents as follows:

- 1. Code of Conduct/Conflict of Interest Policy Awareness.** Contracted and vendor agents working on MA or Part D programs must read and attest that they understand and will follow all applicable policies of the UnitedHealth Group Code of Conduct (including our Conflict of Interest policy).
  - NOTE – all contracted and vendor agents must take action by March 31, 2012. See below for instructions on how to access our Code of Conduct and complete the attestation.
- 2. Fraud, Waste and Abuse (FWA) & Compliance Training:** Agents working on MA or Part D programs must have compliance program training **and** FWA training within 90 days of employment and annually thereafter by the end of the year.
  - NOTE – Contracted and vendor agents satisfy this requirement with the completion of the annual certification modules, specifically the 'Ethics and Compliance' module. There are no additional requirements at this time for agents who have certified.
- 3. Exclusion/ Sanction/ Debarment Checks.** All agents must be in good standing with the Federal health care programs. Current agents, employees, contractors, health professionals, or vendors working on MA or Part D programs must be checked to ensure that none are excluded from participating in Federal health care programs. For information or access to the exclusion databases, see <http://oig.hhs.gov/exclusions/index.asp> and <https://www.epls.gov/>
  - NOTE – Contracted agents are reviewed for excluded status as part of the current UnitedHealthcare contracting process. Vendor Telesales agents are reviewed for excluded status as part of the current Vendor employment process.

### What do you need to know?

We are providing an online Code of Conduct/Conflict of Interest Module and Attestation form for you to meet the requirement of the first issue noted above. The Module will be available January 15, 2012. The information is presented in the form of a presentation with links to additional resources. The Module also includes the full UnitedHealth Group Code of Conduct/Conflict of Interest document: UnitedHealth Group Code of Conduct; Our Principles of Ethics and Integrity.

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- The Code of Conduct/Conflict of Interest Module and Attestation form can be accessed through the Learning Center on the UnitedHealth Group Agent websites:
  - For FMO and Downline agents use <https://www.unitedhealthproducers.com>
  - For ICA and Telesales use <https://www.unitedhealthadvisors.com>
- The module is located immediately below the Prerequisite section.
- Complete the module by agreeing with the attestation statement and submitting your electronic attestation form on the final page of the module.
- The module takes approximately 5-10 minutes to complete
- The Module and attestation form must be completed immediately but no later than **March 31, 2012**.

Please contact your FMO or UnitedHealthcare Compliance Representative with any additional questions. You may also send questions to the compliance mailbox at: [compliance\\_questions@uhc.com](mailto:compliance_questions@uhc.com).

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