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## **Important Reminder for Medicare Advantage Providers**

### **Review Policies for Preventing Medicare Fraud, Waste and Abuse**

To serve our members with 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 our first tier<sup>1</sup>, downstream and related entities (FDRs).

We are also required to ensure our FDRs adhere to these standards, and/or 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 when delivering Medicare services. FDRs also are required to complete general compliance and fraud, waste, and abuse training. To help you get started, please see the information below.

#### **Compass Code of Ethical Business Conduct**

Please review our [Compass Code of Ethical Business Conduct](#) ([FloridaBlue.com](#) > For Providers > Ethics and Compliance) that contains the principles and values by which we operate.

You may adopt our values and principles as outlined in our Compass Code of Ethical Business conduct. If you maintain or create your own program, be sure it includes, at a minimum, the elements described in 42 CFR §§ 422.503(b)(4)(vi)(A) and 423.504(b)(4)(vi)(A).

Please review the general compliance information under [Ethics & Compliance](#) ([FloridaBlue.com](#) > For Providers > Ethics and Compliance). Our Ethics & Compliance section includes:

- Frequently Asked Questions for First Tier, Downstream and Related Entities
- Medicare Compliance and Fraud, Waste and Abuse (FWA) Training
- The Office of Inspector General (OIG) and General Services Administration (GSA) exclusion lists

The Florida Blue Business Ethics, Integrity & Compliance Division will contact select providers by email in the coming months to follow up on progress with these CMS requirements.

#### **Confidential Reporting**

Our Compliance and Ethics [policy](#) includes a link to [EthicsPoint](#), a third-party vendor that offers a confidential, easy-to-use tool for you to contact the Florida Blue Business Ethics, Integrity & Compliance Division. You may ask questions or report compliance and ethics issues or concerns through EthicsPoint and you can choose to remain anonymous. You can also report insurance fraud and abuse by filing a report with Florida Blue's Special Investigation Unit. The reporting form can be found at [FloridaBlue.com/general/fraud-form](#).

#### **If You Have Questions**

Please call our Business Ethics, Integrity & Compliance Division at 1-800-477-3736 ext. 56300 if you need more information. You may also contact our Special Investigation Unit by calling our Fraud Hotline at 1-800-678-8355 or emailing [specinvestunit@bcbsfl.com](mailto:specinvestunit@bcbsfl.com).

<sup>1</sup>First Tier Entity is any party that enters 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).