

2025 Annual Provider Training Fraud, Waste, & Abuse (FWA) and Code of Conduct

Question 1: Why is CareOregon requiring this provider training annually?

- **A:** *The annual Fraud, Waste, & Abuse (FWA) and Code of Conduct training is a Federal and State requirement. CareOregon and affiliated CCOs must implement an effective compliance and ethics program that ensures contracted providers are aware of, and adhere to, the compliance standards intended to prevent FWA.*

Question 2: Does this apply to all employees or only specific roles (providers, admin, temp employees, etc.)?

- **A:** *Yes, all participating provider employees must complete FWA training within the first ninety (90) days of employment/contracting with their employers, including managers, officers, and governing body directors, and must complete training annually thereafter. ([CareOregon's FWA Handbook](#), 2025, p.44).*

Question 3: Can one attestation be submitted on behalf of an organization?

- **A:** *Yes, by attesting on behalf of the organization the submitter is confirming the required training has been completed by all appropriate employees. Attestations can be submitted using this link: [FWA Training Attestation](#)*

Question 4: Do we have to complete CareOregon's training if we already have our own or have completed a similar one through another approved entity/organization within the last 12-months?

- **A:** *Yes, the [FWA Training Attestation](#) is required for all participating provider groups. If an alternative training is completed that includes Oregon Medicaid CCO specific requirements, participating providers still need to attest they will adhere to: 1) CareOregon's Code of Conduct and 2) the reporting process for compliance concerns and suspected or actual violations through the use of EthicsPoint. EthicsPoint maintains anonymity and emphasizes the CCO's policy of non-retaliation for good faith reporting of compliance and FWA concerns ([CareOregon's FWA Handbook](#), 2025, p.31).*

Question 5: Our Staff already completed the annual CMS FWA training, would this suffice to cover the FWA requirement? <https://www.cms.gov/Outreach-and-Education/MLN/WBT/MedicareFraudandAbuse/FraudandAbuse/story.html>

- **A:** *No, the CMS (Medicare) FWA training does not include the Oregon Medicaid specific requirements. The [CareOregon FWA training](#) meets requirements for both Medicare and Oregon Medicaid.*

Question 6: Can we submit the attestation before 6/30/25?

- **A:** *Yes, the 2025 annual [CareOregon FWA training](#) can be completed prior to the June 30th date referenced in the outreach email.*

For Questions: CareOregonComplianceDepartment@careoregon.org