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Subject: FW: Optum Public Sector - Required Training: False Claims Act 2022
Attachments: Requirements-for-HHSA-Contractors-False-Claims-Act-2021.pdf

From: sdu_Provider Services Help <sdu_providerserviceshelp@optum.com>

Sent: Thursday, January 13, 2022 12:46 PM

Subject: Optum Public Sector - Required Training: False Claims Act 2022



Dear Provider:

Note: The information and training materials have a 2021 date as they remain unchanged from Last year.

Optum and that County of San Diego believe FFS/TERM Network Providers are an integral part of ensuring that there are prevention strategies in place to protect client, providers and stakeholders from fraud, waste and abuse. Through the prevention, early detection, investigation and ultimate resolution we support quality of care and sound clinical practices required by the Federal and State False Claims Act.

As a provider on the FFS/TERM Networks you have access to Federal and State False Claims Act training contained on the website (county website) and are expected to review annually.

This communication serves to remind you of your responsibility to complete the County of San Diego False Claim Act training.

The training will be found at this [link](#):

(https://www.sandiegocounty.gov/content/sdc/hhsa/programs/sd/compliance_office/training.html)

The screenshot shows the website for the Health & Human Services Agency. The main header includes the agency name and a search bar. A navigation menu lists: MENU, PROGRAMS, ALL SERVICES A-Z, FACILITIES, ADVISORY BOARDS, and CONTACT US. The main content area features a large teal banner for the "Agency Compliance Office". Below this is a "Training" section with a description and a bulleted list of training topics. The "False Claims Act Training for Contractors" item is highlighted in yellow. To the right of the training list are four colored boxes: Information Security Resources (teal), Privacy Resources (green), Compliance Resources (light green), and Agency Compliance Office (blue). On the far right, there is a sidebar with a language selection dropdown, social media icons (Twitter, RSS, Facebook, Email, YouTube), and a "Popular Services" list including Aging & Independence Services, Behavioral Health Services, Children's Services, Housing & Community Development Services, Public Administrator, Guardian, and Conservator, Public Health Services, Self-Sufficiency Programs, Support Divisions, and Find an office near you.

Attachment: False Claims Act Requirements for Contractors (Providers)

Thank you,

Provider Services Team / Optum San Diego
 Optum San Diego Public Sector

Due to COVID-19 all correspondence should be sent through fax or email

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<p>For local information and daily updates on COVID-19, please visit www.coronavirus-sd.com. To receive updates via text, send COSD COVID19 to 468-311.</p>	
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FALSE CLAIMS ACTS: HHSA CONTRACTOR REQUIREMENTS

Agency Compliance Office
County of San Diego – Health and Human Services
2021





DISCLAIMER

This slide deck is intended as a resource to assist HHSA contractors with common topics related to their contractual requirements. This slide deck is not intended to be a comprehensive set of contract requirements nor legal advice. For a comprehensive description of your contractual requirements, review your contract language.



WHAT ARE THE FALSE CLAIMS ACTS?

- The Federal and State False Claims Acts were enacted to combat fraud, waste and abuse committed by contractors against the government
 - Federal False Claims Act (31 USC 3729-3730)
 - California False Claims Act (CA Govt Code 12650-12653)
- We often refer to both sets of rules, together, as 'FCA'
- Contractors' FCA requirements are typically found in the County contract template, section 8.18



WHAT ARE CONTRACTORS' REQUIREMENTS?

- Contractors must ensure all of their workforce members are trained on FCA, at least annually
 - 'Workforce members' include all positions paid by the contract, including those paid with indirect funds. 'Workforce members' also include those with access to County clients or County client data, even if the positions are unpaid
- Contractors must maintain verification of the training
- Contractors must pass down FCA requirements to their subcontractors, consultants, and other agents



WHERE CAN I FIND THE RULES THEMSELVES?

- Federal False Claims Act:
 - <https://www.justice.gov/civil/false-claims-act>
- California False Claims Act:
 - https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV§ionNum=12650.&article=9.&highlight=true&keyword=False%20Claims%20Act



WHERE CAN I FIND FCA TRAINING?

- There is not a specific training/slide deck that is required of Contractors
- The Agency Compliance Office has posted its FCA training here:
https://www.sandiegocounty.gov/content/sdc/hhsa/programs/sd/compliance_office/contractor_assistance.html

FALSE CLAIMS ACTS



MORE QUESTIONS? ASK US!

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