



Compliance Training September 2008

As outlined in Chapter 9 of the Medicare Prescription Drug Benefit Manual, the Centers for Medicare & Medicaid Services (CMS) requires Medicare Part D Sponsors, first tier entities, downstream entities, and related entities to receive compliance training. This guidance was supplemented with the December 5, 2007 release of the Federal Register notice entitled "Medicare Program; Revisions to the Medicare Advantage and Part D Prescription Drug Contract Determinations, Appeals, and Intermediate Sanctions Processes; Final Rule". You are considered a first tier entity if your organization has entered into a written arrangement with CIGNA to provide administrative services or health care services for a Medicare eligible individual under Part D. You are considered a downstream entity if your organization has entered into a written arrangement below the level of the arrangement between CIGNA and a first tier entity. These written arrangements continue down to the level of the ultimate provider of both health or administrative services.

Currently, CIGNA HealthCare has a contract with your organization to provide services related to the Medicare Part D program which places you in one of the categories above. Annual compliance training is a requirement for all persons involved in the administration or delivery of the Medicare Part D benefit. While we are aware you may already have an established code of conduct, compliance policies and/or a compliance program within your organization, CMS suggests that some entities, particularly those which may have fewer resources, may appreciate the access to the Sponsor's Medicare Part D compliance training program.

If you have not received or delivered annual training within your organization, or if you would like to supplement your existing training, we are making CIGNA's Medicare Compliance Training presentation module available to you. The training has been modified slightly for our first tier entities, downstream entities, and related entities. Note that the training provided is geared toward the CIGNA HealthCare, which holds direct contracts with CMS. If you elect to utilize this module, you should modify the information as appropriate for your organization (first tier or downstream entity). Please do not duplicate or distribute further without CIGNA HealthCare's written consent.

To support your compliance with CMS' expectation relative to Compliance training, you should maintain a log of employees requiring the training, completing the training, and the materials you utilized for training. This information should be available upon request by Sponsors or CMS.

If you have any questions, please contact Rich Appel, Medicare Services Compliance Officer at 860-226-7696.

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