

“HIPAA, Compliance, and Fraud, Waste, and Abuse Training” (FWA Training)

Frequently Asked Questions

Q: Why does CareOregon require this annual training?

A: Annual FWA 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.

Q: When is the FWA Training attestation due?

A: The annual FWA Training should be completed each calendar year (between January 1st and December 31st). The attestation should be submitted **on or before** December 31st of each year. Attestations can be submitted using this link: [CareOregon Training Attestation](#)

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

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

Q: Who is required to take FWA training? Is it all employees or only specific roles (providers, admin, temp employees, etc.)?

A: All participating provider employees must complete FWA Training within the first ninety (90) days of employment/contracting with their employers. This includes managers, officers, and governing body directors. Training must be completed annually thereafter.

Q: I understand that new employees/contractors must complete FWA training within the first 90 days of employment. Does this also mean their attestation needs to be submitted within those 90 days or can their attestation be included in the annual attestation our clinic does on behalf of the providers as a group?

A: New employee/contractor attestations can be included in the annual attestation the clinic submits on behalf of the providers as a group. It is the clinic's responsibility to ensure new employees/contractors take the training within the 90-day timeframe, but attestations do not need to be submitted within the 90-day timeframe. *For example: A clinic/practice attests as a group in June, then a new employee takes the training in July. The new employee would need to submit an attestation since they were not included in the group attestation for the calendar year.*

Q: I understand that new employees/contractors must complete FWA training within the first 90 days of employment. What if an employee starts near the end of the year and doesn't have adequate time to complete the training before December 31st?

A: The annual training cycle runs January 1st through December 31st of each calendar year. A new employee wouldn't be required to attest to the training the same calendar year they started employment if 90 days from hire extends past the current calendar year. *For example: If they were hired on October 3rd, 2026, their 90-day window would extend to January 1, 2027. In this case, as long as the provider organization made sure the new employee took the training within that 90-day window, the new employee wouldn't need to be included on the attestation for 2026 – they could be added to the group's 2027 attestation. However, there will be a 2027 FWA training due by the end of 2027 that they will have to take as well, since the FWA training content changes each year.*

Q: 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?

A: Yes, the CareOregon FWA Training is required for all participating provider groups. No substitute training is accepted.



Q: We already completed the annual CMS FWA training, would this suffice to cover the FWA requirement?

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 Medicaid. No substitute training is accepted.

For questions, please email: ComplianceTeam@careoregon.org