2. Reducing the Burden of the Compliance Program Training Requirements (422.503 and 423.504) (pages 56429 through 54631)

QualChoice Health Plan Services (QCHPS), a subsidiary of Catholic Health Initiatives, is in agreement with CMS’ proposal to delete the regulatory provisions requiring first tier, downstream and related entities to complete the CMS standard training and report back to the plan sponsor that it has been completed. CMS notes that compliance programs are very well established and that the training is not the driver of performance improvement. Also, health plans and FDR’s continue to raise concerns about the regulatory burden of the training. QCHPS agrees with these statements and is in favor of eliminating the requirements.