

Pharmacy Fraud, Waste, and Abuse Training

The Centers for Medicare and Medicaid Services (CMS) regulations require that all entities that support Medicare Part D activities are fully aware of the need to detect, correct, and prevent Fraud, Waste, and Abuse (FWA). CMS does not dictate how plans or pharmacies go about implementing a FWA program; it simply offers guidelines on what constitutes acceptable training topics. Universal American, in a commitment to that compliance, has assembled information that may assist you with developing a program that meets CMS' expectations.

To fulfill this requirement, pharmacies must train their employees through one of the following accepted training modules. Training must be conducted in the 2009 calendar year.

- Universal American's Part D Fraud, Waste and Abuse training module. The link to this training module can be found at:
 - Community CCRx: http://communityccrx.universalamerican.com/main/provider_medicare_fraud,
 - PrescribaRx: <http://www.universalamerican.com/prescribarx/medicare-fraud.aspx>, or
 - MemberHealth: <http://2009.mhrx.com/providers>

- An alternative training program that addresses at a minimum the following topics:
 - Compliance with Federal statutes (i.e., False Claims Act, Anti-Kickback Statute, HIPAA, etc.)
 - Requirement to have appropriate policies and procedures to address fraud, waste, and abuse
 - Types of fraud, waste and abuse that can occur, including but not limited to:
 - Inappropriate billing practices
 - Bait and switch pricing
 - Prescription altering
 - Dispensing expired or altered prescription drugs
 - Illegal remuneration
 - True Out of Pocket (TrOOP) manipulation
 - Incorrect or misleading notices to enrollees
 - U.S. Office of Inspector General (OIG) exclusion list
 - Process for reporting fraud, waste and abuse
 - Protections in non retaliation for employees who report suspected fraud, waste and abuse

Fraud and abuse can be committed by beneficiaries, pharmacies, physicians, third parties, or a combination of all. If you suspect someone has committed fraud, waste or abuse against Community CCRx and/or PrescribaRx, or think you may be a victim, please report the suspicious activity.

Please report fraud, waste or abuse to Community CCRx by calling 1-866-684-5353 or in writing to:

Community CCRx – FWA Unit
P.O. Box 5205
Rensselaer, NY 12144-5205

Reports of fraud, waste of abuse relating to PrescribaRx can be reported by calling 1-800-818-0007 or in writing to:

PrescribaRx – FWA Unit
29100 Aurora Road
Solon, OH 44139

Anonymous reports can be made for either plan by calling the Part D Fraud, Waste and Abuse toll-free hotline at 1-866-684-0595.

All reports are confidential.