

Pharmacy Fraud, Waste, and Abuse Training

The Centers for Medicare and Medicaid Services (“CMS”) regulations require that all entities that support Medicare Parts C and 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’s expectations.

To fulfill this requirement, pharmacies must train their employees through one of the following accepted training modules. Training must be conducted in the 2013 calendar year.

- Universal American’s Fraud, Waste and Abuse training module. The training module can be found at: <http://www.universalamerican.com/pharmacists.aspx>, or <http://www.universalamerican.com/fraud-waste-and-abuse.aspx>
- 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
- In accordance with CMS regulations, effective July 20, 2012, first tier, downstream, and related entities who have met the fraud, waste, and abuse certification requirements through enrollment into the Medicare program are deemed to have met the training and educational requirements for 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 Universal American, or think you may be a victim, please report the suspicious activity to Universal American’s Special Investigations Unit (SIU).

Fraud, Waste, and Abuse Hotline: 1-800-388-1563

Email: Fraud@UniversalAmerican.com

In Writing:
Universal American SIU
4888 Loop Central Drive Ste. 300
Houston, TX 77081

All reports are confidential and may be anonymous.