

## Fraud, Waste, and Abuse Training for Entities that Support Medicare Activities

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 other entities supporting Medicare Parts C and D activities 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, entities that support Medicare Parts C and D must train their employees through one of the following accepted training modules. Training must be conducted in the 2010 calendar year.

- Universal American's Fraud, Waste and Abuse training module. The link to this training module can be found at: <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 June 7, 2010, 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, waste, 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 you are responsible to report the suspicious activity.

Please report fraud, waste, or abuse to the Universal American Special Investigations Unit (SIU).

Fraud, Waste, and Abuse Hotline: 1-866-684-0595

Email: [Fraud@UniversalAmerican.com](mailto:Fraud@UniversalAmerican.com)

In writing:

Universal American SIU  
29100 Aurora Road  
Solon, Ohio 44139

or

Universal American SIU  
4888 Loop Central Drive Ste 700  
Houston, TX 77081

*All reports are confidential and may be anonymous.*