

### ***Medicare Part D Compliance and Fraud, Waste and Abuse (FWA) Training Log***

CMS requires that pharmacies and their employees undertake both (1) general compliance training and (2) fraud, waste, and abuse (“FWA”) training at the time of hire and annually thereafter. A pharmacy that is enrolled in Medicare Part A or B is deemed to satisfy FWA training requirements for Part D, *but not* compliance training requirements. In addition, CMS has also published standard Medicare Parts C and D Fraud, Waste and Abuse training, but has indicated that its training module *does not* satisfy compliance training requirements. Pharmacies are not permitted to develop their own training. It is also crucial that your organization maintain records, such as training materials, attendance logs, or similar records, demonstrating that individual employees underwent the required training, for ten (10) years after the current plan year.

CMS also requires that Medicare payment cannot be made for items or services furnished or prescribed by a person or entity excluded from federal programs.

Employee Name	Date employee completed FWA Training	Employee initials	Manager/ PIC initials

### ***OIG and GSA Exclusion Lists***

Pharmacies participating in the Part D program must review the Department of Health and Human Services Office of Inspector General List of Excluded Individuals and Entities (OIG List) and the General Services Administration Excluded Parties Lists System (GSA List), prior to the hiring of or contracting of any new employee, temporary employee, volunteer, consultant, governing body member, or subcontractor, and **monthly** thereafter.

**Beginning January, 1, 2013, an employee OIG and GSA website search is mandatory monthly.**

- **OIG**                    <http://exclusions.oig.hhs.gov/search.aspx>
- **SAM**                    <https://www.sam.gov/poral/public/SAM>

Employee Name	OIG List Verified	SAM List Verified	Month/ Year	Employee initials	Manager/ PIC initials

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