

UPDATE

MEDICARE PART D 2016

AN EDUCATIONAL SERIES FROM TRINET THIRD PARTY NETWORK

TriNet is providing an education series on the 2016 Medicare Part D plan year. The series provides guidance to help member pharmacies maintain their current Medicare Part D patient base, and to grow their Medicare Part D business.

PHARMACY FRAUD, WASTE, AND ABUSE

The Centers for Medicare & Medicaid Services' (CMS) Fraud, Waste, and Abuse (FWA) regulation requires all Medicare Advantage Organizations (MAOs) and Prescription Drug Plans (PDPs) to provide FWA training to their partners that provide benefits or services as a part of Medicare Part C and Part D programs. This includes pharmacies.

Within this regulation, pharmacies agree to comply with the following:

CHECK EXCLUSION LISTS

Pharmacies must review the U.S. Department of Health & Human Services (HHS) Office of Inspector General (OIG) and the System for Award Management (SAM) exclusion lists when they hire new employees. Pharmacies are also required to check the exclusion lists on a monthly basis.

Employees on such lists can't work with Medicare Part D or any service that will be paid for through federal health care programs.

OIG exclusions database
exclusions.oig.hhs.gov

System for Award Management (SAM) (formerly GSA)
sam.gov



RECORD RETENTION

Pharmacies' record retention of Fraud, Waste and Abuse training and logs must comply with CMS' 10-year record retention regulations.

FWA TRAINING

Pharmacies must provide FWA training to all employees working with Medicare Part D or any other service that will be paid for through a federal health care program. Training must take place within 30 days of hiring and again annually.

Pharmacies must log when employees and managers receive FWA training, and provide a copy of the log and training materials to CMS and Medicare Part D Plans upon request. Pharmacy benefit managers (PBMs) can also request a copy of these materials during an audit.

The Medicare Learning Network (MLN) Provider Compliance section of the CMS website contains CMS-approved FWA training materials and products designed to help health care professionals avoid common billing errors and other improper activities when dealing with CMS programs. Find these at cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/ProviderCompliance.html.

Copies of the CMS FWA training and an FWA training log are also available in the TriNet section of pbahealth.com. Log in to pbahealth.com and choose "TriNet" then "Resources." Choose the "Key Terms" category and then select "Fraud, Waste and Abuse (FWA)."

FWA ATTESTATION REQUIREMENTS

Some PBMs require pharmacies to complete the yearly FWA attestation independently, while others allow TriNet to complete it.

Pharmacies will need to complete the 2015 FWA attestations for the following PBMs independently.

Express Scripts/Medco

<https://www.esiprovider.com>

Humana

For more information, visit humana.com/about/legal/disclaimer-and-licensure/fraud-waste-and-abuse

OptumRx

optumrx.com

(Choose "Health Care Professionals," then "Healthcare Provider Tools," and then "Fraud, Waste and Abuse.")



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CVS/Caremark

Pharmacies that are contracted rural or independently with CVS/Caremark must complete the CVS/Caremark FWA Attestation independently.

caremark.com/pharminfo

(Choose "CVS/caremark Pharmacy Attestation of Completed Compliance/FWA Training.")

You can find this educational series about Medicare Part D 2016 online on the TriNet section of www.pbahealth.com.



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