

# We're fighting fraud, waste and abuse in Medicare Parts C and D. Join us.

## Action Plan

### How to Preserve Program Integrity and Help Fight Medicare Parts C and D Fraud

#### Pharmacy Operations

Join the fight against Medicare fraud. Start by ensuring your pharmacy operations are running at peak efficiency and that you have the right resources to easily spot fraud when it happens.

#### Institute standards as applicable to your practice area:

1. Know your customer.
  - The presenting beneficiary may actually have a stolen patient identity or stolen beneficiary card.
  - Is the prescription part of necessary care?
2. Know your prescriber, specifically the prescriber's signature and DEA registration number.
  - Is the prescription issued for legitimate medical purposes?
3. Work with the plan sponsor/pharmacy benefit manager to resolve concerns or questions.
4. Maintain and refer to the American Geriatrics Society's *Beers Criteria for Potentially Inappropriate Medication Use in Older Adults*.
5. Offer or promote information on local drug take-back programs to assist in disposal of unneeded or expired medications.
6. Review inventory records to assure purchases of a drug category are not unusually rising.
7. Be familiar with practice and control standards of your drug wholesaler and whether your wholesaler is a verified-accredited wholesale distributor.
8. Ensure employees safeguard integrity of operations and beneficiary/enrollee identification information.
9. Implement and maintain a sound fraud, waste and abuse (FWA) program with ongoing FWA training.
  - Perform internal monitoring and auditing of processing procedures.
  - Perform internal monitoring and auditing of claims.
  - Ensure accurate coding and billing on submitted claims.
  - Follow compliance and practice standards.
  - Develop and implement policies and procedures.

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## **FWA program** continued

- Designate a compliance officer or contact.
  - Conduct appropriate training and education.
  - Respond appropriately to detected offenses and implement corrective action.
  - Develop open lines of communication with employees.
  - Enforce disciplinary standards through well-publicized guidelines.
10. Make it part of your routine practice to educate Medicare beneficiaries/enrollees to safeguard their medication(s). Topics may include:
- Do not leave medication accessible to visitors or family members.
  - Dispose of used medication, for example medicated patches.
  - Participate in drug take-back programs.
  - Be cautious about offers to purchase medical supplies, equipment or tests from posted signs, newspaper advertisements, telemarketers or the internet.
  - Consult the list of recommended online pharmacies when buying medicines online at the National Association of Boards of Pharmacy (NABP) Verified Internet Pharmacy Practice Sites.

## **Customer Education**

### **Ensure your customers know how to spot Part D fraud. Educate them on the following:**

A Medicare beneficiary should file a report if he/she is:

1. Asked for his/her Medicare, health plan or Social Security number, bank account number, credit card number or money by an individual or organization claiming to represent Medicare and/or Social Security.
2. Concerned that his/her personal information has been stolen or suspects that personal information might be compromised.
3. Offered money for his/her Medicare Prescription Drug card or Medicare Part C plan membership card.
4. Offered money to visit specific providers, suppliers or pharmacies.
5. Asked to get drugs for someone using his/her Medicare Prescription Drug card or Medicare Part C plan membership card.
6. Concerned that a pharmacy is not dispensing all of his/her drugs that are being billed.
7. Billed for drugs, products or services he/she did not receive as reflected on the Medicare customer's explanation of medical benefit form.
8. Billed for drugs, products or services that do not accurately reflect the nature of the products or services received as stated on the Medicare customer's explanation of medical benefit form.
9. Receiving unsolicited calls for medical services, supplies or tests.

**If you suspect fraudulent behavior and/or practices, immediately contact the appropriate plan sponsor/pharmacy benefit manager or call:**

**1-877-7SafeRx (1-877-772-3379)**

