

Hometown Health Plan

Hometown Health Plan		Current Version Effective Date:	02/28/13
		Next Review Date:	02/28/14
		Creation Date:	02/26/07
Title:	Introduction; Fraud, Waste and Abuse Detection, Prevention and Correction Program		
Category:	Fraud, Waste and Abuse (FWA) Detection, Prevention and Correction Program Policies and Procedures – Medicare Advantage – Prescription Drug Plan	Revision History: 10/25/12 __/__/__ __/__/__ __/__/__	
Number:	Hometown.FWA.001		
Author:	Jamie Winter, Hometown Health Compliance Manager		

Scope:

Unless otherwise limited, the Hometown Health Plan's Compliance Policies and Procedures apply to the following individuals and entities:

- 1) All Employees as defined in Hometown Medicare Program Participation (MPP).001;
- 2) All members of the Board of Directors, officers and managers of Hometown Health Plan, Inc., all entities of the Hometown Health Plan and Compliance Committee members;
- 3) Related entities, as defined in Hometown.MPP.001, in the same manner and to the same extent as they apply to Hometown Health Plan; and
- 4) Delegated Subcontractors and Network Providers, as defined in Hometown.MPP.001, in the manner and to the extent set forth in Hometown Health Plan's policies and procedures.

Purpose:

The purpose of Hometown.FWA.001 is to provide an overview of the Medicare Part D and Medicare Advantage Fraud, Waste and Abuse Detection, Prevention and Correction Program of Hometown Health Plan ("FWA Program"). The FWA Program is an important, specific component of Hometown Health Plan's Part D and MA Compliance Program.

Policy:

Hometown Health Plan's FWA Program is part of the Hometown Health Plan Medicare Part D and Medicare Advantage Compliance Program.

Procedures:

- 1) General Policies and Procedures
 - A) Hometown Health Plan's FWA Program covers a variety of specific topics applicable to both the Medicare Part D and MA Programs and consists of the following policies and

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procedures:

- 1) Introduction; Fraud, Waste and Abuse Detection, Prevention and Correction Program (Hometown.FWA.001);
- 2) Specific Processes for Detecting and Preventing Fraud, Waste and Abuse (Hometown.FWA.002);
- 3) Cooperation and Coordination with MEDICS and Others (including Referring Fraud, Waste & Abuse to MEDICS and Others) (Hometown.FWA.003);
- 4) Specific Processes for Monitoring Delegated Functions in Connection with the FWA Program (Hometown.FWA.004); and
- 5) Identifying, Reimbursing, and/or Seeking Recovery of Overpayments (Hometown.FWA.005).

B) Hometown Health Plan’s Medicare FWA Program shall be periodically reviewed by the Hometown Health Plan Compliance Manager in conjunction with the Renown Health Corporate Compliance Officer, on a schedule designated by the Compliance Manager, but no less often than once every twenty-four (24) months. Revisions to the FWA Program shall be proposed and approved, as provided for in Renown.CCD.160, to incorporate, as appropriate, any material changes in applicable laws, regulations and Part D and MA Program Guidance relating to fraud, waste and abuse detection, prevention and correction.

C) The Compliance Manager will work with Hometown Health Plan MA and Part D personnel, and Delegated Subcontractors, as appropriate, to develop practical strategies for implementing the policies and procedures set forth in this FWA program.

2) Definitions. Throughout these FWA Program Policies and Procedures, the following definition applies:

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A) Medicare Drug Integrity Contractor (MEDIC). An organization that CMS has contracted with to assist in perform specific program integrity functions for Part D under the Medicare Integrity Program. A MEDIC is delegated specified functions by CMS to assist in the management of CMS' audit, oversight, and anti-fraud and abuse efforts in connection with administration of the Part D benefit.

Questions Related to Hometown.FWA.001 Policy and Procedure. Any questions concerning Hometown.FWA.001 or questions that are not specifically addressed by this policy should be directed to the Hometown Health Plan Compliance Manager or the Renown Health Corporate Compliance Officer.

Audit and Documentation. Hometown Health Plan shall audit and document compliance with Hometown.FWA.001. Such audit shall be conducted pursuant to the procedures set forth in Renown.CCD.315 and Hometown.CGP.007. Relevant documentation shall be maintained in Hometown Health's Part D and MA Compliance Program files, consistent with Hometown Health Plan's document retention policies.

References:

- Medicare Prescription Drug Benefit program regulations, 42 Code of Federal Regulations Part 423;
- Medicare Advantage program regulations, 42 Code of Federal Regulations Parts 422;
- Medicare Prescription Drug Benefit Manual, Ch. 9 (Compliance Program Guidelines); and
- Medicare Managed Care Manual, Ch. 21 (Compliance Program Guidelines)

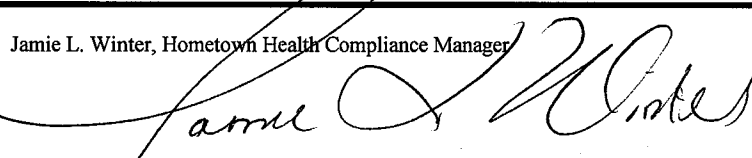
Contributors:

- Janice H. Ziegler, Esq., Sonnenschein Nath & Rosenthal LLP
- Jamie L. Winter, Hometown Health Compliance Manager

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<i>Authorization:</i>	Jamie L. Winter, Hometown Health Compliance Manager 
	Ty Windfeldt, Vice President 