

# Hometown Health Plan

		Current Version Effective Date:	02/28/13
		Next Review Date:	02/28/14
		Creation Date:	02/26/07
Title:	Specific Processes for Monitoring Delegated Activities in Connection with the Fraud, Waste and Abuse Detection, Prevention and Correction Program		
Category:	Fraud, Waste and Abuse Detection, Prevention and Correction Program Policies and Procedures (FWA) Medicare Advantage - Prescription Drug Plan	Revision History:	
Number:	Hometown.FWA.004	10/25/12	__/__/__
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.004 is to describe Hometown Health Plan’s specific processes for monitoring activities of its Delegated Subcontractors and Network Providers that have been assigned to such entities in connection with Hometown Health Plan’s Part D and MA Fraud, Waste and Abuse Detection, Prevention and Correction Program (“FWA Program”).

**Policy:**

It is Hometown Health Plan’s policy to engage in active, on-going monitoring of FWA Program activities that have been assigned to Delegated Subcontractors and Network Providers in connection with Hometown Health Plan’s Part D and MA programs. Such monitoring shall be designed to ensure that Delegated Subcontractors and Network Providers are performing FWA Program activities appropriately consistent with their contract obligations.

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**Procedures:**

1) General Policies and Procedures.

A) As a component of Hometown Health Plan’s Part D and MA Compliance Program, the FWA Program incorporates the Medicare Part D and MA Compliance Program policies and procedures governing Contracting With and Monitoring Delegated Subcontractors and Network Providers. See Hometown.CGP.010 and Hometown.CGP.011. Accordingly, this specific policy supplements Hometown.CGP.010 and Hometown.CGP.011 and must be read in conjunction with these policies.

2) Specific Policies and Procedures.

A) Overview. In addition to Hometown Health Plan’s general monitoring of Delegated Subcontractors and Network Providers pursuant to Hometown.CGP.010 and Hometown.CGP.011, under this policy, the Compliance Manager or his or her designee shall specifically monitor those activities relating to the detection, prevention and correction of fraud, waste and abuse that have been delegated by Hometown Health Plan (“Delegated FWA Activities”) to Delegated Subcontractors and Network Providers (collectively, the “Delegated FWA Entities”).

1. For example, Hometown Health Plan may delegate to its MA-PD Pharmacy Benefits Manager the responsibility for monitoring network pharmacies for, among other things, prescription forging or altering.
2. For example Hometown Health Plan may delegate to its Network Providers the responsibility for screening employees annually against the Department of Health and Human Services’ Office of Inspector General (“OIG”) exclusion list and/or for training employees concerning fraud, waste and abuse issues relating to the Part D and MA programs.

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- B) Periodic Dialogue. The Compliance Manager or his or her designee shall engage in periodic communication with Hometown Health Plan's Delegated FWA Entities regarding issues and risk areas related to fraud, waste and abuse generally and Delegated FWA Activities specifically in order to understand, influence or direct the scope and nature of such Delegated FWA Activities, and to understand the results of such activities.
- C) FWA Program Policies, Procedures and Systems. The Compliance Manager or his or her designee shall ensure that Delegated FWA Entities who are responsible for Delegated FWA Activities develop, implement and maintain specific policies and procedures and/or systems necessary to support such Delegated FWA Activities consistent with relevant contractual obligations.
- D) Work Plan. As part of the FWA Work Plan, as defined in Hometown.FWA.002, the Compliance Manager shall identify risk areas that fall within the scope of the Delegated FWA Activities. No less often than once annually, the Compliance Manager or his or her designee shall review each Delegated FWA Entity's work plan (or other orchestrated strategy) for detecting, preventing and correcting fraud waste and abuse to ensure, among other things, appropriate attention to risk areas related to the relevant Delegated FWA Activities.
- E) Audits and Reviews.
  1. The Compliance Manager or his or her designee shall conduct or arrange for audits or reviews, no less often than once annually, of Delegated FWA Entities regarding their performance of Delegated FWA Activities consistent with their contractual obligations and CMS Program Rules.
  2. In addition to annual reviews, the Compliance Manager or his or her designee may, in his or her discretion, conduct random audits or reviews of Delegated FWA Entity

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performance with respect to Delegated FWA Activities. The Compliance Manager or his or her designee shall share his or her findings with the Delegated FWA Entity and require corrective action, as appropriate.

3. If the Delegated FWA Entities conduct self-evaluations of their Delegated FWA Activities, the Compliance Manager or his or her designee shall conduct periodic examination of these evaluations. In such context, the Compliance Manager shall, as appropriate, seek written assurance of the adequacy of the Delegated FWA Entity's work plan.

**F) Reports.**

1. In his or discretion, the Compliance Manager or his or her designee shall review periodically any reports generated by Delegated FWA Entities with respect to Delegated FWA Activities.
2. If the Delegated FWA Entity identifies a potential FWA issue, Hometown Health Plan shall work with the Delegated FWA Entity to determine the appropriate means of corrective action.

**G) Training and Education.** The Compliance Manager or his or her designee shall (1) provide, in his or her discretion, training, education and reeducation to Delegated FWA Entities regarding the prevention of fraud, waste and abuse, and (2) periodically review training and education materials and training logs related to detection, prevention and correction of fraud, waste and abuse of Delegated FWA Entities.

**H) Monitoring for Exclusion.** Hometown Health Plan shall obtain certifications from its Delegated Subcontractors and Network Providers that, pursuant to their contracts, and as required under Hometown.CGP.005, these contractors have satisfied their obligations to (1) ensure that no Board member or employee is on the OIG or General Services Administration exclusion list, (2) notify Hometown Health Plan where a Board

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member or employee is on one of these lists, and (3) immediately remove from any work related, directly or indirectly, to any federal health care programs any Board member or employee discovered to be on such lists.

- I) Documentation. Consistent with Hometown Health Plan’s document retention policies, Hometown Health Plan shall maintain in Hometown Health Plan’s Part D and MA Compliance Program files copies of documentation.

**Questions Related to Hometown.FWA.004 Policy and Procedure.** Any questions concerning Hometown.FWA.004 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.004. 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)

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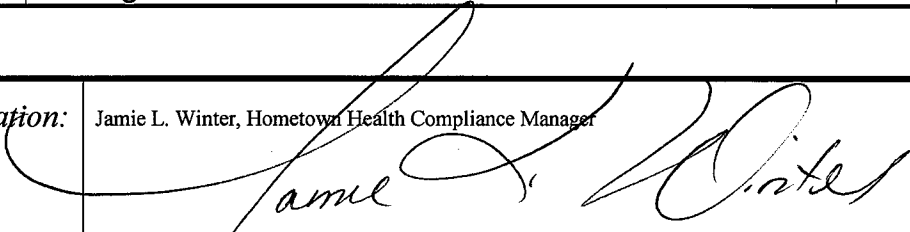
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Ty Windfeldt, Vice President

