

COMPLIANCE CONNECTION

IN THIS ISSUE:

Personnel Corrective Action
CMS Enforcement Actions

THE MEDICARE COMPLIANCE NEWSLETTER

February 2016

2017 COMPLIANCE & FWA TRAINING

In March 2017, Meridian will disseminate our annual Medicare Compliance and Fraud, Waste and Abuse (FWA) training to our vendors. This is a requirement under CMS regulations and your contract with Meridian. We will be providing you with more detail via direct mail.

DISCLOSURE & NON-RETALIATION POLICY

As a Meridian business partner, you have an obligation to disclose to us issues of non-compliance. Issues can range from operational deficiencies, to deficiencies with member impact. You must report the incident immediately to your Meridian contract administrator, or any member of the Compliance Department. We maintain a strict non-retaliation policy that prohibits anyone from being retaliated against for making a good faith report of a potential compliance or FWA violation.

FWA REMINDER

Fraud, waste and abuse (FWA) describes actions that are illegal, inappropriate or wasteful and have the effect of compromising the financial and regulatory integrity of the health care system. Some common [examples](#) of FWA may include:

- A provider fraudulently bills for a service that was never rendered
- A member over-utilizes a service when it is not medically necessary
- A provider routinely up-codes to get higher reimbursement

If you suspect acts of FWA, you must report them to your Meridian contact. We will conduct a thorough investigation and take appropriate actions.

OIG EXCLUSION SCREENING

Medicare rules prohibit us from doing business with companies (and employees of such companies) listed on the Office of Inspector General's (OIG) [Exclusion List](#). This list contains the names of companies and individuals who have been excluded from participation in Medicare, Medicaid and all other Federal health care programs due to a healthcare violation. You are required to screen your employees against this list at time of hire and monthly.

COMPLIANCE PROGRAM & STANDARDS OF CONDUCT

We recently updated our [Medicare Compliance Program & Standards of Conduct](#). It is located on our [website](#) along with other information, such as Fraud, Waste & Abuse (FWA).

DISCIPLINARY ACTIONS

CMS regulation requires the imposition of disciplinary action when a compliance violation has occurred, as appropriate. Please refer to page 28 (Policy C-5) of the **Medicare Compliance Program & Standards of Conduct** for more details.

You have an obligation to assess whether an employee's non-compliant action warrants corrective action. Examples of behavior that may warrant a corrective action include:

- Failing to report a known compliance issue
- Routinely failing to implement compliant and effective processes
- Failing to adequately remediate repeat audit findings

If you suspect that someone has committed a potential compliance or Fraud, Waste & Abuse (FWA) act, you must report the incident immediately to any member of the Compliance Department. You may also report anonymously by emailing [EthicsPoint](#) or calling **855-375-6725**. The hotline is available 24 hours a day/7 days a week. Remember, not only is reporting the right thing to do, but it is also a mandatory company policy. Failure to report a compliance or FWA matter may result in disciplinary actions, up to and including termination of contract.