

Compliance Program

Policy: Compliance Fraud, Waste, and Abuse Training **Number:** CD-0005

Programs: Title XIX and Title XXI

Effective Date: Title XIX January 24, 2008

Title XXI August 1, 2013

Approved by:

Title	Name	Signature
Compliance Officer	Mark Hudak, MD	<i>Mark J. Hudak M.D.</i>
Dates Revised	2/5/2009, 12/16/2009, 7/10/2010, 7/6/2011, 10/27/2011, 11/22/2012, 8/8/2013, 9/14/2014, 8/29/2016, 1/31/2017	
Ped-I-Care Approved	1/30/2008, 9/2/2008, 8/30/2010, 9/24/2012, 9/6/2013, 9/25/2015, 9/30/2016, 3/13/2017	

Responsible Parties: Compliance Department, Network Management Department, Member Services Department, and University of Florida Human Resources Department

Purpose

Ped-I-Care in coordination with the Compliance Director/Compliance Department regularly disseminates information to employees, providers, and members to ensure they are aware of the applicable health care regulations as well as fraud, waste, and abuse statutes, State statutes, and the Professional Code of Ethics with which they are expected to comply.

Policy

All employees, contracted providers, and members of Ped-I-Care are educated about fraud, waste, and abuse. Employees must complete the self-study Fraud, Waste, and Abuse Training program.

Procedures

1. Ped-I-Care's self-study Fraud, Waste, and Abuse Training is maintained and accessible year round at <http://www.pedicare.peds.ufl.edu/compliance/index.html>.
2. All Ped-I-Care employees must complete Fraud, Waste, and Abuse Training program within the first thirty (30) days following their date of hire and annually thereafter.
3. The training consists of:
 - a. Elements of the Ped-I-Care Compliance Program including but not limited to:
 - i. Federal Deficit Reduction Act
 - ii. False Claims Act(s)
 - iii. Stark Laws
 - iv. Anti-kickback Laws
 - v. Compliance auditing and monitoring (internal as well as external)
 - vi. Compliance Reporting Hotline and toll-free state telephone numbers for reporting fraud, waste, and abuse
 - b. Fraud, Waste, and Abuse Responsibilities and Penalties
 - c. Ped-I-Care employee, provider, and member reporting obligations, protections, and non-retaliation/non-retribution for reporting
2. The Compliance Department maintains a log of employee training.
3. Practices/providers are responsible for ensuring their staff is trained regarding Fraud, Waste, and Abuse and any applicable rules and regulations. Completion of Ped-I-Care's online training is not mandatory but is recommended and may be utilized as a resource for practices to train providers and staff.
 - a. Ped-I-Care's online training is available for practices/providers to educate staff.
 - b. Ped-I-Care sends practices a pdf version of the online training when requested. The practice maintains documentation of any employee training not conducted online.
4. Members are educated about fraud, waste, and abuse through the Member Handbook, newsletters, during calls to Ped-I-Care's Member Services Department when appropriate, and on Ped-I-Care's website.

References

Office of Inspector General's Model Compliance Program, (November 1999)

Center for Medicaid and Medicare Services Managed Care Manual, Chapter 11; 20.2 and 120, (December 2004, March 2002 respectively)

Agency for Health Care Administration, Interpretive Guidelines, (July 2004), 59A-12.004(1)(a), F.A.C.

Health Care Compliance Association, Evaluating and Improving A Compliance Program, (April 2003)

Accreditation Association for Ambulatory Health Care, Inc., Accreditation Guidebook for Managed Care Organization, Chapter 7, (2004)