

# Midwest Health Plan, Inc. Provider Newsletter March 2010



**Medical Director's Report  
Dr. Mark Tucker**

## **PHARMACY ANNOUNCEMENT!!**

### **MDCH Changes to Carved Out Drugs for Medicaid Members Effective April 1, 2010**

The State of Michigan Department of Community Health (MDCH) is making changes to coverage of certain medications on April 1, 2010 for Medicaid Members. The drugs known as MHP 60/40 carve outs will no longer be covered as part of the Midwest Health Plan benefit. These medications include:

**Antidepressants  
Sedatives/Hypnotics  
Anticonvulsants**

**Antianxiety  
MAO Inhibitors  
ADHD Drugs**

After 4-1-2010, all prescription claims for these medications must be billed directly to the MDCH's contracted Pharmacy Benefit manager by the pharmacy. Pharmacies billing Midwest Health Plan will receive a rejected claim. For a list of covered medications, please refer to the Michigan Pharmaceutical Product List (MPPL) found on the website at:

[www.michigan.fhsc.com/Providers/Drug](http://www.michigan.fhsc.com/Providers/Drug) Information

**Please note these important Michigan Department of Community Health changes:**

- Starting 4-1-2010, the **State of Michigan** requires a copay for beneficiaries over 21 years of age. **State of Michigan** copays under Fee for Service are:
  - **\$1.00 for generic medications**
  - **\$3.00 for brand name medications**
- All Midwest Health Plan prior authorizations will be suspended on 3-31-2010. After 4-1-2010, these medications will be subject to current Fee for Service pharmacy policies and coverage limitations, including prior authorization requirements.

## **ANNOUNCEMENT!!**

To: MHP Primary Care Physicians

### **Re: Physical Assessment Incentive**

Midwest Health Plan (MHP) will again offer the Physical Assessment Incentive for 2010. We encourage you to complete a physical assessment on all new MHP members to promote quality care. The Physical Assessment Incentive pays an additional \$100 for a physical assessment completed on a new member.

**To receive this additional incentive, members must be new to Midwest Health Plan between May 1, 2010 and July 31, 2010 and the assessment must be conducted within the first 90 days of enrollment to Midwest Health Plan. Members must remain active with the PCP for a minimum of 90 days to be considered as eligible.**

Members considered new to Midwest are noted on your eligibility lists with an asterisk (\*) next to their name which is bolded (in purple) and underlined. To assist your office in contacting the member, the eligibility list includes the member's phone number on file with the State of Michigan.

Payment for the eligible physicals will be made at the end of the year to the tax ID. The codes payable for this visit are:

**CPT codes: 99381-99387, 99391-99397**  
**ICD-9 codes: V20.2 and V70.0**

NOTE: This \$100 incentive is in addition to the qualifying Pay for Performance (P4P) bonus measures and Fee for Service reimbursement. These assessments done on new ABAD members will count towards the “ABAD Member’s Visit Percentage” bonus.

For questions, please contact your Provider Representative:

Linda Abdelghani at 313-586-6013  
Gena Neault at 313-586-6039

Nehya Moslimani at 313-586-6055  
Brian Flemming at 313-586-6069

## **CODING FOR OFFICE AND INPATIENT CONSULTATIONS**

### **Status of CPT Codes for office (99241 – 99245) and inpatient (99251 – 99255) Consultations**

Effective 1/1/2010, CMS no longer recognizes, and will not pay for, the CPT codes for office and inpatient consultations. Midwest Advantage will pay claims consistent with this policy. CMS suggests billing for these services using the most appropriate E&M code for the office visit or care provided during an inpatient stay.

Currently, the CPT codes for office and inpatient consultations remain on the Medicaid fee schedule. Midwest Health Plan will continue to pay for these services as long as the CPT codes are deemed eligible for payment by Medicaid. However, effective 1/1/2010, Midwest Health Plan will not pay a PCP (or covering physician) for an office or inpatient consultation on their own member.

## **PRIOR AUTHORIZATION – TAMIFLU & RELENZA**

Effective September 1, 2009, Tamiflu and Relenza will not require a prior authorization. Quantity limits will allow one course of treatment for one individual per Rx for Midwest members.

## **H1N1 FLU VACCINE**

The Michigan Department of Community Health has issued a policy bulletin, MSA 09-50, regarding coverage and reimbursement of the 2009 Influenza A (H1N1) monovalent vaccine.

**The bulletin is provided as an attachment to this newsletter for information.**

## **Access to Health Services Staff**

All Members and Practitioners of Midwest Health Plan (MHP) have the right to contact Midwest Health Plan staff to discuss utilization management (UM) issues. All Health Services staff is accessible for members or providers who have questions regarding any UM process during normal business hours. Midwest Health Plan has a toll free number (888) 654-2200 for members or providers calling to discuss UM issues.

Midwest Health Plan (MHP) recognizes that participating providers may choose to exercise their right to appeal a utilization management (UM) decision. The appeals process is established to

facilitate this right. The Midwest Health Plan Medical Director is available for providers who need to discuss a denial. You may contact the Medical Director at (888) 654-2200

## **Appeals**

Midwest Health Plan (MHP) recognizes that participating providers may choose to exercise their right to appeal a utilization management (UM) decision. The appeals process is established to facilitate this right. If a provider disagrees with a utilization management decision the provider may file an appeal. The provider must make the appeal in writing to the Midwest Health Plan Medical Director. Midwest Health Plan will accept verbal appeals only in emergent situations.

If the MHP Medical Director can not reverse the adverse determination

- A physician not involved in the initial denial will review the case.
- The physician reviewer will be of the same specialty of the requesting physician with similar credentials and licensure.
- The appeal will be resolved within 15 calendar days (up to 30 calendar days total for all levels of appeal) of the request for appeal.

When the request for urgent care is denied by the MHP Medical Director, MHP gives members and practitioners confirmation of the decisions within 72 hours of receipt of the request. Verbal notification is given within 72 hours of receipt of the appeal request, with written notification within 3 calendar days.

## **Pharmacy Update**

The Pharmacy and Therapeutics Committee continues its task of reviewing all drug classes to determine the following for each available drug in the drug class:

- Formulary Status – non-formulary or formulary
- Prior Authorization or Step Therapy requirements – if any
- Addition to or Deletion from the Preferred Drug List

As each drug class is reviewed, a summary of the review is posted to the Midwest Health Plan website ([www.midwesthealthplan.com](http://www.midwesthealthplan.com)) under the Providers link and the Pharmacy Information tab. Each entry is identified by the drug class name and includes the date of the most recent review. The summary is in a table format with information on the status of the drug for each of the programs administered by Midwest Health Plan. A legend is provided below the table to help interpret the abbreviations utilized in the table. Special notes, if any, are noted below the table to help in understanding the logic behind some of the decisions.

Also, Midwest Health Plan has posted to the website, under the Providers link and the Pharmacy Information tab, the following summary documents that will be updated as necessary:

- Midwest Health Plan Formulary - lists all drugs available
- Preferred Drug List - lists all Preferred Drugs, by therapeutic class
- Step Therapy Table - drugs that require prior use of another medication, including the step 1 drug

- Prior Authorization (PA) Table - lists the PA requirements for those drugs that require PA

Questions can be directed to the Health Services Department or Medical Director at 313-586-6030 or toll free at 888-654-2200. To request any of the pharmacy documents on paper contact the Health Services Department at 313-586-6030 or toll free at 888-654-2200.

### **Fraud, Waste and Abuse CMS Mandated Training in Provider Offices**

On December 5, 2007, CMS issued a final rule addressing 42 C.F.R. Part 422 regarding the Medicare Advantage program. Pursuant to this final rule, MA Organizations, such as MHP, are required to:

- Maintain appropriate oversight and attest it will implement a compliance plan that is designed to detect, prevent and correct fraud, waste and abuse and includes effective training and education between the compliance officer, organization employees, contractors, agents and directors. Participation in training programs should be a condition of continued employment and a criterion included in employee evaluations.
- Establish training and communication requirements for first tier, downstream and related entities with which MHP has a contractual relationship. In this respect, the first tier, downstream and related entities with who MHP contracts must undertake the training required by the regulations and addressed by this memorandum, and must attest to MHP that such training has been completed.
- Obtain training logs and copies of attestations from their first tier, downstream and related entities to comply with this requirement. Accordingly, your organization must submit the required attestation within the designated timeframe to MHP and must maintain internal training logs.

Please refer to the attached memo “CMS Mandated training for Providers, First Tier, Downstream and Related Entities. This memo applies to you and your practice. Please read the memo and complete Exhibit A and return to Midwest by March 31, 2010 as documentation of your compliance with this CMS rule.

Additionally, the Michigan Association of Health Plans (MAHP) has placed a link to the CMS required Fraud, Waste and Abuse training video on their website. To access the video you will need to go to the MAHP website page (URL below) where the direct link to the video is provided. <http://www.mahp.org/robot/hiddenlinks.html>. If you have any questions, please contact Kathy Harkness at #313-586-6063.

### **Midwest Health Plan now offers affordable, easy-to-use healthy living benefits!**



Midwest Health Plan has teamed up with Weight Watchers® to offer our members a program

that more physicians have recommended to their patients than any other weight loss plan. With nearly 1,000 meetings held throughout the franchise area, members will be able to find a meeting that is convenient for them. Midwest members can purchase a 12 week Weight Watchers PASS at \$138 (a 25% savings off the published price) by just showing their Midwest Health Plan Member ID card at participating meeting locations. For more information or to find a meeting place call 1-888-3Florine or go to <http://www.888-3-florine.com/midwest.php> .

## **Obesity Toolkit Resource Grid**



The Institute for Health Care Studies (IHCS) at Michigan State University has compiled a resource grid that contains information and Web site links to various Obesity Toolkits that are available on the internet. To access the “Obesity Toolkits for Providers” grid, please go to: <http://www.ihcs.msu.edu> and click on the grey “Obesity” tab on the home page. If you do not have internet access and would like a printed version of the Obesity resource grid, or if you have any questions, please call the Midwest Health Plan Quality Improvement Department at 313-586-6065.

## **BEHAVIORAL HEALTH SERVICES**

In accordance with our Medicaid contract with the State of Michigan, Midwest Health Plan members are allowed 20 out-patient mental health visits per calendar year.

MHP members requiring Mental Health Services may obtain these services by:

- Obtaining a referral from their Primary Care Physician to a contracted psychiatrist or behavioral health provider.
- Direct contact of a behavioral health care provider. This may be a contracted or non-contracted provider.
- In a crisis, self-referring to the nearest emergency room that provides psychiatric services.

Refer to the Midwest Health Plan Provider Directory for a list of behavioral health practitioner. You can find a pdf version of the Directory and a searchable provider directory on our Web site at [www.midwesthealthplan.com](http://www.midwesthealthplan.com) .

Patients that meet the guidelines under Medicaid Policy for serious mental illness or severe emotional disturbance or who need more than 20 out-patient visits in one calendar year should be referred to the Community Mental Health board of their county of residence.

**Substance abuse services are not a covered benefit of MHP.** Members seeking those services should be referred to the Community Mental Health board of their county of residence. The following is a listing of phone number that may be accessed by members when requesting SA services:

City of Detroit – 800-467-2452

Washtenaw County - 800-440-7548

Wayne County – 800-686-6543

Macomb County – 586-541-2273

Oakland County - 248 858-5200

St. Clair County – 888-225-4447

Livingston County – 800-615-1245

## **PAY FOR PERFORMANCE 2010**

Midwest Health Plan has expanded and increased the funding for our Pay for Performance (P4P) Bonus program starting January 2010. We have added additional measures that are eligible for bonuses and also included a bonus when your Diabetic member has received all their necessary services and for when a child has received all their necessary vaccines by age 2. Midwest is also continuing our CDPS/ABAD diagnosis reporting and percentage of members seen for visits bonus program in 2010. The Bonus programs for 2010 are attached.

We continue to enhance our “Opportunities Reports” on our website to notify you of the members who are due for bonus payment services so that you can increase your revenue. If you have any questions, please contact your Provider Services Representative:

Linda Abdelghani #313-586-6013

Nehya Moslimani #313-586-6055

Gena Neault #313-586-6039

Brian Flemming #313-586-6069

Exhibit B  
Attachment 2

MIDWEST HEALTH PLAN  
PAY FOR PERFORMANCE BONUS PROGRAM

Effective 1/1/10

SERVICE	TIME FRAME	LIMITATION	CPT CODES	ICD-9 CODES	BONUS
<b>Childhood Immunization</b>			<b>Additional \$100 bonus for completing all P4P Childhood Immunizations by age 2!</b>		
DTaP	Before age 2	4 doses	90698/ 90700/ 90721/ 90723	99.39	\$10 per vaccine
IPV	Before age 2	3 doses	90698/ 90713/ 90723	99.41	\$10 per vaccine
Hepatitis B	Before age 2	3 doses	90723/ 90740/ 90744/ 90747-90748	070.2/070.3/V02.61	\$10 per vaccine
Hib	Before age 2	2 doses	90645-90648/ 90698/ 90721/ 90748		\$10 per vaccine
MMR	Between age 1 & 2	1 dose	90707/ 90710	99.48	\$10 per vaccine
VZV	Between age 1 & 2	1 dose	90710/ 90716	052/053	\$10 per vaccine
Pneumococcal conjugate	Before age 2	4 doses	90669		\$10 per vaccine
Hepatitis A	Before age 2	2 doses	90633	070.0/070.1	\$10 per vaccine
Rotavirus	Before age 2	2 or 3 doses	2 doses=90681/3 doses=90680		\$10 per vaccine
Influenza	Between 6 mos & 2 yrs	2 doses	90655/90657/90661/90622	99.52	\$10 per vaccine
<b>Lead Screening</b>					
Blood lead test	Before age 2	1 per year	83655/ <b>83655QW</b>		\$15 per test
<b>Adolescent Immunization</b>					
MCV4	Age 11 - 12	1 dose	90733/90734		\$10 per vaccine
Tdap/ Td	Age 10 - 12	1 dose	90715/90714/90718	99.39	\$10 per vaccine
Tetanus & Diphtheria	Age 10 - 12	1 dose each	90703 & 90719	99.38/99.36	\$10 per vaccine
<b>Testing for Pharyngitis</b>					
Strep test at time of diagnosis	Age 2 - 18	Each event	87070-87071/ 87081/87430/87650-87652/87880/ <b>87880QW</b> & dx code 462/463/034.0		\$10 per test
<b>Preventive Medicine Services</b>					
	Age 0 - <12 mos	6 visits	<b>99381/99391</b>	V20.2	\$15 per visit
	Age 12 mos – 35 mos	2 per year	<b>99382/99392</b>	V20.2	\$15 per visit
	Age 3 - 11	1 per year	<b>99382/99392/99383/99393</b>	V20.2	\$15 per visit
	Age 12 – 17	1 per year	<b>99384/99394</b>	V20.2	\$15 per visit
	Age 18 - 65+	1 per year	<b>99385-99387/99395-99397</b>	V70.0	\$15 per visit
<b>Woman's Health</b>					
Mammogram screening	Age 38 – 69	1 per year	77055-77057	V76.11/V76.12	\$25 per service
Pap test	Age 18 – 64	1 per year	HCPCS Q0091	V72.32/V76.2	\$25 per service
Chlamydia screening	Age 16 – 24	1 per year	87110/87270/87320/87490-87492/87810		\$25 per service
<b>Diabetic Care (250.xx/648.0)</b>			<b>Additional \$100 bonus for completing all P4P Diabetic Care in CY 2010</b>		
HbA1c	Age 18 - 75	1 per year	83036/83037/ <b>83036QW/83037QW</b>		\$25 per service
LDL-C	Age 18 - 75	1 per year	80061/83700/83701/83704/83721/ <b>80061QW/83721QW</b>		\$25 per service
Nephropathy screening	Age 18 - 75	1 per year	82042/82043/82044/84156/ <b>81002QW/81003QW/82044QW</b>		\$25 per service
Diabetic eye exam	Age 18 - 75	1 per year	92002/92004/92012/92014/92018-92019/92225-92226/92230/92235/92240/92250/ 92260	V72.0	\$25 per service

**Bold & Italicized codes will be paid Medicaid FFS rates**

Bonus also paid for well care services provided at “sick” visits when billed with above codes

An additional \$100 bonus per eligible member for all immunizations completed by age 2

An additional \$100 bonus per eligible member for all diabetic care performed between 1/1/10 & 12/31/10

## Pay For Performance

Aid to the Blind and Disabled (ABAD) Bonus Program --2 Parts to the ABAD/Chronic Disease and Disability Payment System (CDPS) P4P

### 1. Current Year CDPS Qualifying Diagnosis \$25.00 per Qualifying Diagnosis per ABAD (Ongoing payment as appropriate diagnoses are reported)

There are 19 Diagnoses Categories that the ABAD/CDPS diagnoses fall into. We will pay you for ONE diagnosis per category per member. For example, Member X has a visit in January. You report Diabetes with Renal Manifestations (250.41). We will pay you \$25 because the diagnosis falls into the Diabetes Category. Next month, Member X comes in again and you report Diabetes with Hyperosmolarity (250.23) and Left Heart Failure (428.1). We will pay you \$25 for the new category reported (Cardiovascular) but we already paid you for the Diabetes category. The list of ABAD diagnosis categories is:

#### ABAD Categories

[AIDS -](#)

[Cancer -](#)

[Cardiovascular -](#)

[Central Nervous System -](#)

[Cerebrovascular -](#)

[Developmentally Disabled](#)

[Diabetes -](#)

[Eye -](#)

[Gastrointestinal -](#)

[HIV -](#)

[Hematological -](#)

[Infectious -](#)

[Metabolic -](#)

[Psychiatric -](#)

[Pulmonary -](#)

[Renal -](#)

[Skeletal -](#)

[Skin](#)

[Substance abuse -](#)

The entire list of diagnoses and categories is found on our website in the secure login section. Remember, we still request that you report EVERY diagnosis the patient has at EVERY visit.

### 2. Member's Non Visit Percentage\*:

Less than 35% \$40 per ABAD Member\*\* (See 65 -74.9 % of your ABAD members during the year)  
Less than 25% \$60 per ABAD Member\*\* (See 75-84.9 % of your ABAD members during the year)  
Less than 15% \$80 per ABAD Member\*\* (See 85% or more of your ABAD members during the year)

\*One payment per year paid at highest possible rate based on member visits to the PCP from 1/1 to 12/31 of the contract year, with claims submission by 1/31 of the following year. Bonus will be paid by the end of the first quarter of the following year.

\*\*Bonus paid for each Member with PCP as of 12/31 of contract year whether or not that member was seen by PCP.

## **PREFERRED PROVIDERS**

Midwest Health Plan is currently transitioning members who have oxygen and related supplies to the preferred provider network. Services which are requested with non preferred providers will be re-directed.

**Please use only Preferred Providers when requesting  
DME, P&O, Home Care, or Infusion Care**

To arrange for services, you may contact the providers directly or the Midwest Health Plan Health Services Department at 313-586-6072 or FAX 313-586-6045. All Home Care, Infusion, P&O and DME requests require plan approval. The providers will obtain the required plan authorization.

Also, when requesting Physical Therapy, Occupational Therapy, or Speech Therapy - authorizations will only be approved with contracted providers. Requests to non-contacted providers will be re-directed.

**DME Preferred Providers**

<u>Name</u>	<u>Phone</u>	<u>Fax</u>
Advanced Medical Solutions <ul style="list-style-type: none"> <li>• Howell Office</li> <li>• Brighton Office</li> <li>• Ann Arbor Office</li> </ul>	800-248-2229 517-548-1443  810-225-7701  734-528-2522	800-552-9443 517-548-1588  810-225-8062  734-528-2312
Motor City Medical	800-929-0160 248-545-4520	800-411-7993 248-414-7352
Oakwood Home Medical Equipment <ul style="list-style-type: none"> <li>• Allen Park Location</li> <li>• Oakwood Hospital Location</li> </ul>	800-752-2273  313-271-3550	313-271-0276  313-271-3755
Phoenix Medical Supply	888-699-4362	248-354-9638
J&B Medical Supply	800-737-0045	800-737-0012
Trudell Pharmacy	313-581-2424	313-581-2193

**Home Care Preferred Providers**

<u>Name</u>	<u>Phone</u>	<u>Fax</u>
Oakwood Home Care Services	800-757-7711	313-996-3025

Crystal Home Care	313-493-4900	313-493-4904
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**Infusion Preferred Provider**

<u>Name</u>	<u>Phone</u>	<u>Fax</u>
Complete Infusion	734-425-2550	734-425-2620

**Prosthetics and Orthotics Preferred Provider**

<u>Name</u>	<u>Phone</u>	<u>Fax</u>
Michigan Orthopedics	734-513-8205	734-513-8219

**PATIENT CENTERED MEDICAL HOME (PCMH)**

The Patient Centered Medical Home is a health care setting that facilitates partnerships between individual patients and their personal physicians and, when appropriate, the patient’s family. Care is facilitated by registries, information technology, health information exchange and other means to assure that patients get the indicated care when and where they need and want it in a culturally and linguistically appropriate manner.

There are many resources and opportunities to help providers learn more about PCMH and begin to take steps towards becoming a certified medical home. A partial list of resources is provided below. If you have questions, please contact the Quality Improvement Department at 313-586-6063.

**Resources:**

- Registry Examples:
  - Wellcentive : #877-692-6180 Wellcentive is offering many incentives to IPAs and PHOs
  - Cielo: #734-827-1000
- Blue Cross Blue Shield Physician Group Incentive Program (PGIP): <http://www.bcbsm.com> (provider site/value partnerships/PGIP) or call #248-448-3306
- Improving Performance in Practice (IPIP): <http://ipip.aiag.org>
- American College of Physicians: [http://www.acponline.org/running\\_practice/technology/](http://www.acponline.org/running_practice/technology/)  
This site has updated information on the American Recovery and Reinvestment Act of 2009
- National Committee for Quality Assurance (NCQA) Physician Practice Connections® - Patient Centered Medical Home™: <http://www.ncqa.org/tabid/631/Default.aspx>

## **OB CODING**

Midwest does not accept global OB billing (Global Codes such as 59400, 59410, 59510, 59515, 59610, 59614, 59618, 59622). Midwest requires that you “bill individual component codes”. Also, please note that when billing for the prenatal services, please note the from and to dates should be FROM-the first date of service and TO-the last date of service. Please put the individual dates in Box 19. Claims will be rejected if not submitted correctly.

## **QUALITY IMPROVEMENT**

### **QI PROGRAM AND EVALUATION**

Midwest Health Plan’s QI Program, Work Plan, and Annual Program Evaluation are available to you on our web site at [www.midwesthealthplan.com](http://www.midwesthealthplan.com) or you may request a paper copy. While we continue to meet the majority of our goals set for last year, we still have areas that need improvement. Our CAHPS and HEDIS scores need to improve. We are enhancing our disease management/health outreach programs. We are striving to become more proactive and provide you with “Opportunity Reports” on our Web site in the secure provider area that lists your patients that are due for services (instead of lists of patients that are overdue for services). We like to keep you informed of our goals and progress in meeting our goals through the newsletter (i.e. results of audits and surveys). We will be glad to share with you our QI program, plan and progress in meeting our goals—just ask!! If you do not have access to the internet and would like a paper copy of our QI program or Annual Evaluation, please call the QI Department at 313-586-6065.

### **MANAGEMENT OF ASTHMA: Increase or over-use of short-acting inhaled $\beta_2$ -agonists may indicate the need for long-term control therapy**

Current guidelines for the diagnosis and management of asthma from the National Heart, Lung, and Blood Institute (NHLBI) acknowledge that persistent asthma is most effectively controlled with daily long-term control medication, specifically, anti-inflammatory therapy. Currently, the most potent and consistently effective inhaled anti-inflammatory agents available are orally inhaled corticosteroids. Use of short-acting inhaled  $\beta_2$ -agonists on a daily basis, or increasing use, may indicate the need for additional long-term control therapy. Taking long-acting inhaled  $\beta_2$ -agonists does not eliminate the need for continued treatment with an anti-inflammatory agent.

Please refer MQIC Clinical Guidelines for the Management of Asthma which can be found on the Midwest Web site at [www.midwesthealthplan.com](http://www.midwesthealthplan.com) or on the MQIC Web site at [www.mqic.org](http://www.mqic.org) Patients with **persistent asthma** should be prescribed **daily long-acting control medications**.

Midwest will be sending you pharmacy profiles of patients on a quarterly basis who in the last three months are identified as receiving multiple fills of short-acting beta agonists in the absence of inhaled corticosteroids. In accordance with EPR-3 guidelines, we ask that you consider adding the long-term controller medicine for your identified patients. We recognize that a number of patient-specific variables, which are not available to us, must be taken into account. Our findings and suggestions are provided as supplementary information for your consideration and review.

If you have any questions or comments, please contact the Health Management Department at

313-586-6071.

## **DISEASE MANAGEMENT**

### **Asthma and Diabetes Disease Management Programs**

**Diabetes Control Network:** When enrolled, members will receive information on how to take care of their diabetes. Call **1-313-586-6071** to refer your patient into this program. After joining, the member will be sent information on what diabetes is, how to control blood sugar, taking medications the right way, exercising, eating right, eye and foot care and other important information.

**Asthma Focus:** When enrolled, members will receive educational information in the mail. To refer your patient into this program, call **1-313-586-6071**. After joining, the member will be sent information on asthma triggers, use of medications, peak flow meter use, an asthma action plan to complete with PCP, information on stopping smoking, and much more.

### **GLAUCOMA SCREENING**

Glaucoma is an eye condition that develops when too much fluid pressure builds up inside the eye. This pressure can damage the optic nerve and if left untreated, glaucoma can cause blindness. Because most people with glaucoma have no early symptoms or pain, it is important that persons have a complete eye exam with their ophthalmologist or optometrist regularly. Glaucoma occurs most frequently in adults over age 40. Glaucoma cannot be prevented, but if it is diagnosed and treated early, the disease can be controlled. Please remember to screen your Medicare members (age 67 years or older) each year. Please refer to the *Adult Preventive Services (Ages 50-65+) Guideline*, which can be found on our website at [www.midwesthealthplan.com](http://www.midwesthealthplan.com).

### **CONTROLLING HIGH BLOOD PRESSURE**

High blood pressure is a major risk factor for heart and kidney disease, stroke, and heart failure. High blood pressure is especially dangerous because it often gives no warning signs or symptoms. Hypertension can be treated with medication, diet, and exercise. Please review the *Medical Management of Adults with Hypertension Guideline*, which can be found on our website at [www.midwesthealthplan.com](http://www.midwesthealthplan.com).

### **HELP FOR PATIENTS WITH CHRONIC DISEASE: THE PATH PROGRAM**

**Empower your patients:** The PATH (Personal Action Towards Health) program, also known as the Stanford Chronic Disease Self-Management Program, is a powerful workshop designed for people with on-going health conditions like heart disease, lung disease, diabetes and arthritis. This evidence-based self-management workshop helps participants learn the techniques and strategies they need to take an active role in managing their health. The workshop is offered at little to no cost to participants, and is conveniently located at churches, senior centers, and

community centers in communities across Michigan. The workshop has been endorsed by the Centers for Disease Control Arthritis Program, following rigorous research and evaluation which proved they were highly effective.

**The Workshop:** The workshop is led by two leaders, trained and certified (many leaders have chronic diseases themselves) by national and state master leaders. The workshop is designed to build skills and self-efficacy of participants through goal setting and action plans. Topics covered over the 6-week workshop include: stress management, medication use, exercise alternatives, coping techniques and more. Workshop sessions meet for 2 ½ hours, once a week for 6 weeks. Session size is small to encourage active participation, with 10-15 participants per workshop. Since 2007, the program has served over 2000 participants in Michigan, with 99% of participants reporting they would recommend the workshop.

**Where you come in:** We encourage you to learn more about PATH, and discuss the program with your patients or family members who may benefit from this positive, skill-building workshop. A recommendation from you, other health care provider, or your office staff has an immense influence on your patients. For additional information on PATH, or to find a workshop near you, please visit [www.MiPATH.org](http://www.MiPATH.org) or contact Karen McCloskey at the Michigan Department of Community Health at 517-335-1236 or [mccloskeyk@michigan.gov](mailto:mccloskeyk@michigan.gov).

## **HEALTH OUTREACH**

### **Alliance for Immunization in Michigan (AIM)**

The AIM Provider Immunization Toolkit for Children & Adults is a resource guide containing the most current standards of practice, forms, and vaccination methodologies for immunizations in Michigan. To order a hard copy of the kit, visit the AIM website at, [www.aimtoolkit.org](http://www.aimtoolkit.org).

### **ROSEBUD PREGNANCY EDUCATION PROGRAM**

Midwest Health Plan would like to remind you of our telephonic case management and education program for pregnant members and their infants. ROSEBUD® is staffed by nurses who specialize in perinatal care and case management.

The Perinatal Case Management program targets women at risk for complications during pregnancy. The program supports the healthcare providers plan of care as well as provide ongoing education to the expectant mother and her family.

You may refer members to this program, by calling the Health Outreach Department at 313-586-6071. You may also fill out the Notification of Pregnancy form (attached at end of newsletter) and fax it to 313-581-2780, Attention: Health Management Department. Thank you for your help!

### **SMOKING CESSATION PROGRAM**

Midwest Health Plan's "I Can Quit" Smoking Cessation Program can help members quit smoking. This is a telephone health coaching program. The program includes: five proactive phone calls by a dedicated health coach over a 12 month period. Health coaches offer strategies

to increase self-efficacy, identify barriers to change, and provide techniques to cope with and overcome barriers. For more information on our “I Can Quit” Smoking Cessation Program or to refer any of your patients to the program, call **1-313-586-6071**.

## **HEDIS UPDATE**

### **Lead Screening**

This is a new hybrid measure for HEDIS that started 1/1/07. It’s the percentage of children two years of age who had one or more capillary or venous lead blood tests for lead poisoning by their second birthday. Midwest will reimburse you \$12 for every lead test conducted. Codes to Identify Lead Tests: CPT 83655

## **EPSDT/WELL CHILD VISITS – DEVELOPMENTAL SCREENING**

The American Academy of Pediatrics recommends developmental surveillance at every well-child visit and developmental screening using formal, validated tools at **9, 18, and 30** months or whenever a parent or provider concern is expressed. Surveillance and screening activities should be performed and coordinated with tracking and intervention services available in the community

Please be sure to conduct a developmental screening at every EPSDT/ Well Child Visit and code it with **CPT 96110** – Developmental testing, limited with interpretation and report. **Midwest pays a bonus of \$15 per well visit in addition to the fee for service or capitation payment.** Please be sure to code developmental screenings using CPT code 96110.

### **Developmental Surveillance**

Surveillance is the process of recognizing children who may be at risk of developmental delays. Developmental surveillance is a flexible, longitudinal, continuous, and cumulative process whereby knowledgeable health care professionals identify children who may have developmental problems. There are 5 components of developmental surveillance:

- Eliciting and attending to the parents’ concerns about their child’s development
- Documenting and maintaining a developmental history
- Making accurate observations of the child
- Identifying the risk and protective factors
- Maintaining an accurate record and documenting the process and findings

### **Developmental Screening**

Developmental screening is the administration of a brief standardized tool aiding the identification of children at risk of a developmental disorder. Developmental screening that targets the area of concern is indicated whenever a problem is identified during developmental surveillance. For more information please visit:

- Listing of developmental screening tools (American Academy of Pediatrics):  
<http://pediatrics.aappublications.org/cgi/content-nw/full/118/1/405/T1>
- Coding Fact Sheet for Primary Care Pediatricians:  
<http://www.medicalhomeinfo.org/screening/DevProvider.html>.

**Remember to conduct a developmental screening at every EPSDT/ Well Child Visit and code it: CPT 96110 – Developmental testing, limited.**

## **PROVIDER SERVICES**

### **BASICARE NO LONGER PRINTING ID CARDS**

Wayne County will no longer be printing ID Cards for BasiCare members. The eligibility lists for BasiCare members is found on our website in the Office Manager section with all your Midwest Product lines eligibility. After checking the eligibility list, if you still have a question about a member's eligibility, please contact Customer Services.

### **WIN CANDY**

Your office will have the chance each month to win a free box of candy. All you have to do is answer the questions on the last page of the newsletter and fax the page to us at 313-581-2780. If your answers are correct, the candy will be mailed to your office. Please refer to our website at [www.midwesthealthplan.com](http://www.midwesthealthplan.com) for the list of winners. **If you do not answer the questions correctly, you will not receive the candy.** So keep up the good work and keep responding. If you're not participating, you should. It's quick and easy and all you have to do is read the newsletter and answer the questions. Please try it. **Congratulations** to those offices who responded correctly. We hope you are enjoying the candy! The **February** office winners include:

**Everingham Clinic, P.C.**  
**My Kid's Doc, Southfield**  
**Urogynecology Associates, Beaumont**  
**Hollywood Pediatric Clinic, Dr. Shah**  
**My Family Doctor, Southgate**  
**Madan Gupta, M.D., Southfield**  
**Marcia Vanderbroek, DO, Trenton**  
**Kamala Vanaharam, MD, Shelby/Utica**  
**Park Medical Clinic, Roseville**  
**Park Medical Clinic, Lincoln Park**  
**Stephen Swetech, D.O.**

## **Answers for February 2010 Candy Contest**

- 1. As of 1/1/10, CMS no longer recognizes and will not pay for which CPT codes?**

Office CPTs 99241 – 99245  
Inpatient Consultations CPTs 99251 – 99255

- 2. What are the two additional \$\$ amounts of bonus added to our Pay For Performance (P4P) program for 2010?**

\$100.00

- 3. True**

The Patient Centered Medical Home is a health care setting that facilitates partnerships between individual patients and their personal physicians and, when appropriate, the patient's family.

- 4. What is the date of our next Primary Care Provider meeting?**

February 17, 2010

## March 2010 Candy Contest

- 1. True or False (circle one)** The Physical Assessment Incentive for 2010 pays an additional \$100 for a physical assessment completed on a new member between May 1, 2010 and July 31, 2010.
- 2. True or False (circle one)** If the MHP Medical Director can not reverse the adverse determination of an appeal, the appeal will be resolved within 15 calendar days (up to 30 calendar days total for all levels of appeal) of the request for appeal.
- 3.** Midwest Health Plan members are allowed \_\_\_\_\_ (number) out-patient mental health visits per calendar year.
- 4. True or False (circle one)** Midwest does not accept global OB billing (Global Codes such as 59400, 59410, 59510, 59515, 59610, 59614, 59618, 59622).

**Your Name:** \_\_\_\_\_  
**From the office of Doctor:** \_\_\_\_\_ **PIN** \_\_\_\_\_  
**Office Site Name:** \_\_\_\_\_  
**Phone Number:** \_\_\_\_\_

**Please fax this completed sheet to (313) 581-2780**



## Notification of Pregnancy Form 2010

Phone number: 313-586-6071

Fax number: 313-581-2780

### MEMBER DATA

Date		Date of Birth	
Last Name		First Name	
Address		Phone #	
City		Alternate Phone #	
ZIP		Recipient ID	

### HEALTHCARE PROVIDER DATA

PCP Name		PCP ID #	
Address		Ste	
Zip		Phone #	
OB Provider		OB Phone #	

### PERINATAL INFORMATION

<b>Maternal:</b>			
LMP		Date last Pap test	
EDC		Date Chlamydia screen	

### RISK FACTORS / COMMENTS

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Midwest Health Plan thanks you for notifying us of members who are pregnant.

# Memorandum

**To:** All providers, first tier, downstream, and related entities

**From:** Midwest Health Plan

**Date:** December, 2009

**Re:** CMS Mandated Training for Providers, First Tier, Downstream and Related Entities

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## I. INTRODUCTION

It is the practice of Midwest Health Plan (MHP) to conduct its business with the highest degree of ethics and in compliance with all laws. MHP has adopted written policies and procedures to comply with business standards, federal and state laws. MHP has established effective lines of communication and has a dedicated compliance officer to monitor suspected violations, and, when appropriate, to oversee corrective actions to prevent future violations.

Midwest Health Plan (MHP) is a Medicare Advantage (MA) Organization that contracts with the Centers for Medicare & Medicaid Services (CMS) to offer health coverage to eligible enrollees. As an entity that contracts with MHP to provide health and/or administrative services on behalf of our MA beneficiaries, your organization must meet new education and training requirements related to fraud, waste and abuse (FWA).

The purpose of this memorandum is to provide FWA compliance training as required by the federal regulations and Medicare guidance. Specifically, this memorandum includes: an overview of the revised regulations; relevant definitions related to the regulations; education requirements; fraud, waste and abuse training; a sample attestation, training log and resources.

## II. REVISED REGULATIONS

On December 5, 2007, CMS issued a final rule addressing 42 C.F.R. Part 422 regarding the Medicare Advantage program. Pursuant to this final rule, MA Organizations, such as MHP, are required to:

- Maintain appropriate oversight and attest it will implement a compliance plan that is designed to detect, prevent and correct fraud, waste and abuse and includes effective training and education between the compliance officer, organization employees, contractors, agents and directors. Participation in training programs should be a condition of continued employment and a criterion included in employee evaluations.

- Establish training and communication requirements for first tier, downstream and related entities with which MHP has a contractual relationship. In this respect, the first tier, downstream and related entities with whom MHP contracts must undertake the training required by the regulations and addressed by this memorandum, and must attest to MHP that such training has been completed.
- Obtain training logs and copies of attestations from their first tier, downstream and related entities to comply with this requirement. Accordingly, your organization must submit the required attestation (**Exhibit A**) within the designated timeframe to MHP and must maintain internal training logs (**Exhibit B**).

### III. DEFINITIONS

**Plan Sponsor:** An entity that has a contract with CMS to offer one or more of the following Medicare products: MA Plans, MA Prescription Drug Plans, Prescription Drug Plans (PDP) and 1876 Cost Plans.

**First Tier Entity:** Any party that enters into a written arrangement acceptable to CMS with a Sponsor or applicant to provide administrative services or health care services for a Medicare eligible individual under the MA or Part D programs.<sup>1</sup>

**Downstream Entity:** Any party that enters into a written arrangement, acceptable to CMS, below the level of the arrangement between a Sponsor and a first tier entity. These written arrangements continue down to the level of the ultimate provider of both health and administrative services.<sup>2</sup>

**Related Entity:** Any entity that is related to the MA Organization by common ownership or control and (1) performs some of the MA Organization's management functions under contract or delegation; (2) furnishes services to Medicare enrollees under an oral or written agreement; or (3) leases real property or sells materials to the MA organization at a cost of more than \$2500 during a contract period.<sup>3</sup>

**Fraud:** An intentional act of deception, misrepresentation or concealment in order to gain something of value. Examples of fraud include billing for services not furnished; billing for services at a higher rate than is justified; soliciting, offering or receiving a kickback, bribe or rebate; or violations of the physician self-referral (Stark) prohibition.

**Waste:** Use or expend carelessly, extravagantly, or to no purpose.

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<sup>1</sup> 42 C.F.R. 422.2.

<sup>2</sup> *Id.*

<sup>3</sup> *Id.*

**Abuse:** May be intentional or unintentional and directly or indirectly results in unnecessary or increased costs to the Medicare program. Examples of abuse include: charging in excess for services or supplies; providing medically unnecessary services; or providing services that do not meet professionally recognized standards.

#### **IV. EDUCATION REQUIREMENTS**

According to federal regulations, MHP is ultimately responsible for oversight and monitoring of education and training of first tier, downstream and related entities. As one of these entities, your organization can comply with the FWA education and training requirements by satisfying one of the following three options:

- (1) Provide your own training in accordance with 42 C.F.R. 422.504 (b) (4) (vi) (c) – “Effective training and education between the compliance officer and organization employees, contractors, agents and directors.”
- (2) Take training from another MA Organization.
- (3) Complete the training provided by MHP.

Your organization must submit the required attestation (**Exhibit A**) within the designated timeframe to MHP and must maintain internal training logs (**Exhibit B**).

#### **V. FRAUD, WASTE AND ABUSE TRAINING**

##### **A. Documentation Requirements**

Your organization is required to complete the attestation attached hereto, which must be signed by an authorized representative. Upon request, your organization may be required to submit copies of training logs demonstrating that your employees received FWA training.

If your organization has contracted with other entities to provide health and/or administrative services on behalf of MHP MA and/or Part D beneficiaries, you will need to obtain attestations from those entities that they have completed FWA training. In addition, those entities will also need to provide your organization with copies of their training logs.

##### **B. Relevant FWA Laws**

###### *1. False Claims Act*

The False Claims Act prohibits knowingly presenting (or causing to be presented) to the federal government a false or fraudulent claim for payment or approval. When submitting claims data to CMS for payment, MHP and our subcontractors must certify that claims data is true and accurate to the best of their knowledge and belief.

The False Claims Act is enforced against any individual/entity that knowingly submits (or causes another individual/entity to submit) a false claim for payment to the federal government. \*\*\* Note, intent to defraud is not necessary to prove that the government was in fact defrauded, as long as it is established that the person acted with “intent to defraud.”<sup>4</sup>

## 2. *Anti-Kickback Statute*

Section 1128B9b of the Social Security Act provides criminal penalties for individuals and entities that knowingly and willfully offer, pay, solicit or receive remuneration in order to induce or reward business payable (or reimbursable) under the Medicare or other federal health care programs.<sup>5</sup> For purposes of the anti-kickback statute, “remuneration” includes the transfer of anything of value, directly or indirectly, overtly or covertly, in cash or in kind. Recent kickback cases have involved unlawful referral payments in the form of free office space, free equipment, free drugs or supplies, inflated or sham consulting contracts, and travel and entertainment by physicians by hospitals, pharmaceutical companies and laboratories.

In addition to applicable criminal sanctions, an individual or entity may be excluded from participation in the Medicare and other federal health care programs and subject to civil monetary penalties for violations of the Anti-Kickback Statute.

## 3. *Self-Referral Prohibition Statute (Stark Law)*

The federal Stark law prohibits physicians from referring Medicare patients to an entity with which the physician or a physician’s immediate family member has a financial relationship, unless an exception applies.<sup>6</sup>

## 4. *HIPAA*

The Health Insurance Portability and Accountability Act of 1996 (HIPAA), Public Law 104-191, applies to covered entities, including health care providers and health plans.

Individuals, organizations, and agencies that meet the definition of a covered entity under HIPAA must comply with statutory and regulatory requirements to protect the privacy of health information and provide individuals with certain rights with respect to their health information.<sup>7</sup>

### **C. Examples of Potential FWA**

#### 1. *Potential FWA committed by a MA Organization and/or Part D Plan Sponsor*<sup>8</sup>

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<sup>4</sup> 42 U.S.C. 1320a-7b.

<sup>5</sup> 42 U.S.C. 1320a-7b(b).

<sup>6</sup> 42 U.S.C. 1395nn.

<sup>7</sup> 45 C.F.R. Part 164.

<sup>8</sup> Medicare Prescription Drug Benefit Manual, CMS Pub. 100-18, Chapter 9, Section 70.1.1.

Potential FWA committed by a MA Organization and/or Part D Plan Sponsor could include unlawful marketing schemes, such as:

- Unsolicited door-to-door marketing.
- Enrollment of beneficiaries without their knowledge or consent.
- Stating that a marketing agent/broker works for or is contracted with the Social Security Administration or CMS.
- Requires beneficiaries to pay up front premiums.

## 2. *Potential FWA committed by a Prescriber*<sup>9</sup>

Potential FWA committed by a prescriber could include:

**Illegal remuneration schemes** – Prescriber is offered, or paid, or solicits, or receives unlawful remuneration to induce or reward the prescriber to write prescriptions for drugs, products or services.

**Script mills** – Prescriber writes prescriptions for drugs that are not medically necessary, often in mass quantities, and often for patients that are not theirs. These scripts are usually written, but not always, for controlled drugs on sale on the black market, and might include improper payments to the prescriber.

**Provision of false information** – Prescriber falsifies information (not consistent with medical record) submitted through a prior authorization or other formulary oversight mechanism in order to justify coverage. Prescriber misrepresents the dates, descriptions of prescriptions or other services furnished, or the identity of the individual who furnishes the services.

**Theft of provider's DEA number or prescription pad** – Prescription pads and/or DEA numbers can be stolen from prescribers. This information could illegally be used to write prescriptions for controlled substances or other medications often sold on the black market.

## 3. *Potential FWA related to billing*<sup>10</sup>

Potential FWA committed by a provider could include:

- Billing for items or services not rendered or not provided as claimed;
- Submitting claims for equipment or supplies and services that are not reasonable and necessary;
- Double billing resulting in duplicate payment;
- Billing for non-covered services as if covered;
- Knowing misuse of provider identification numbers, which results in improper billing;

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<sup>9</sup> Medicare Prescription Drug Benefit Manual, CMS Pub. 100-18, Chapter 9, Section 70.1.4.

<sup>10</sup> Medicare Prescription Drug Benefit Manual, CMS Pub. 100-18, Chapter 9, Section 70.1.3.

- Unbundling;
- Failure to properly code using coding modifiers;
- Altering medical records;
- Compensation programs that offer incentives for items or services ordered and revenue generated;
- Inappropriate use of place of service codes;
- Routine waivers of deductibles and coinsurance;
- Clustering; and
- Upcoding the level of service provided.

#### 4. *Potential FWA committed by a Pharmacy Benefit Manager*<sup>11</sup>

Potential FWA committed by a pharmacy benefit manager could include:

**Unlawful remuneration** – Pharmacy benefit manager receives unlawful remuneration in order to steer a beneficiary toward a certain plan or drug, or for formulary placement. Includes unlawful remuneration from vendors beyond switching fees.

**Failure to Offer Negotiated Prices** – Occurs when a pharmacy benefit manager does not offer a beneficiary the negotiated price of a Part D drug.

#### 5. *Potential FWA committed by a Retail Pharmacy*<sup>12</sup>

Potential FWA committed by a retail pharmacy could include:

**Bait and Switch Pricing** – Occurs when a beneficiary is led to believe that a drug will cost one price, but at the point of sale the beneficiary is charged a higher amount.

**Prescription Drug Shorting** – Pharmacist provides less than the prescribed quantity and intentionally does not inform the patient or make arrangements to provide the balance, but bills for the fully-prescribed amount.

**Prescription Forging or Altering** – Where existing prescriptions are altered, by an individual without the prescriber’s permission to increase quantity or number of refills.

#### 6. *Potential FWA committed by a Pharmaceutical Manufacturer*<sup>13</sup>

**Illegal Off-label promotion** – Illegal promotion of off-label drug usage through marketing, financial incentives, or other promotion campaigns.

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<sup>11</sup> Medicare Prescription Drug Benefit Manual, CMS Pub. 100-18, Chapter 9, Section 70.1.2.

<sup>12</sup> Medicare Prescription Drug Benefit Manual, CMS Pub. 100-18, Chapter 9, Section 70.1.3.

<sup>13</sup> Medicare Prescription Drug Benefit Manual, CMS Pub. 100-18, Chapter 9, Section 70.1.5.

**Illegal Usage of Free Samples** – Providing free samples to physicians knowing and expecting those physicians to bill the federal health care programs for the sample.

#### 7. *Potential FWA committed by a Beneficiary*<sup>14</sup>

Potential FWA committed by a beneficiary could include:

**Misrepresentation of Status:** A Medicare beneficiary misrepresents personal information, such as identity, eligibility, or medical condition in order to illegally receive the drug benefit. Enrollees who are no longer covered under a drug benefit plan may still attempt to use their identity card to obtain prescriptions.

**Identity Theft:** Perpetrator uses another person’s Medicare card to obtain prescriptions.

**Prescription forging or altering:** Where prescriptions are altered, by someone other than the prescriber or pharmacist with prescriber approval, to increase quantity or number of refills.

**Prescription diversion and inappropriate use:** Beneficiaries obtain prescription drugs from a provider, possibly for a condition from which they do not suffer, and gives or sells this medication to someone else. Also can include the inappropriate consumption or distribution of a beneficiary’s medications by a caregiver or anyone else.

**Prescription stockpiling:** Beneficiary attempts to “game” their drug coverage by obtaining and storing large quantities of drugs to avoid out-of-pocket costs, to protect against periods of non-coverage (*i.e.*, by purchasing a large amount of prescription drugs and then disenrolling), or for purposes of resale on the black market.

**Doctor shopping:** Beneficiary or other individual consults a number of doctors for the purpose of inappropriately obtaining multiple prescriptions for narcotic painkillers or other drugs. Doctor shopping might be indicative of an underlying scheme, such as stockpiling or resale on the black market.

### **D. Reporting and preventing FWA**

#### *1. Reporting Potential FWA*

Compliance with state and federal laws and regulations and Medicare program requirements is a priority to MHP. If your organization or other downstream entity with which you contract to provide health and/or administrative services on behalf of MA or Part D beneficiaries has questions regarding compliance generally, has questions regarding MHP’s FWA compliance policies or training, or identifies potential FWA, please contact:

- Your organization’s compliance officer or compliance hotline; and/or

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<sup>14</sup> Medicare Prescription Drug Benefit Manual, CMS Pub. 100-18, Chapter 9, Section 70.1.7.

- MHP:

Kathleen M. Harkness, RN, MS, CPHQ,  
Sr. Director of Corporate Quality  
Midwest Health Plan  
5050 Schaefer Road  
Dearborn, MI 48126  
(313) 586-6063;

and/or

- Office of Inspector General:

Office of the Inspector General  
HHS TIPS Hotline  
P.O. Box 23489  
Washington, DC 20026  
(800) HHS-TIPS ((800) 447-8477) (phone)  
(800) 223-8164 (fax)  
[hhstips@oig.hhs.gov](mailto:hhstips@oig.hhs.gov)

When making an inquiry, please provide as much information as possible regarding your question or concern, including the following information:

- Contact information (Name, address, telephone number - **\*\*\* Note, you also may report anonymously. Retaliation is prohibited when you report a compliance concern in good faith**);
- Type of item or service involved;
- Place of service;
- Nature of the compliance question or allegation(s) (if applicable);
- Timeframe of the allegation(s) (if applicable).

## 2. *Preventing Potential FWA*

CMS has adopted the following strategies to prevent fraud and abuse:

- Effective enrollment procedures and education of physicians, providers, suppliers and beneficiaries.
- Early detection through Medical Review (MR) and data analysis.
- Close coordination with law enforcement and other agency partners.
- Applying fair and firm enforcement policies.

In addition, your organization should establish disciplinary guidelines for non-compliant or fraudulent behavior, which should include mandatory retraining and which may include disciplinary action, including possible termination when behavior is serious, repeated, or when knowledge of a possible violation is not reported.

### **E. Attestation, Training Log and Resources**

Your organization must submit the required attestation (**Exhibit A**) within the designated timeframe to MHP and must maintain internal training logs (**Exhibit B**). A list of FWA resources is also attached as **Exhibit C**.

**EXHIBIT A**

**ATTESTATION**

As a first tier, downstream or related entity, \_\_\_\_\_ attests that it has conducted appropriate education and training to identify, correct and prevent potential fraud, waste and abuse, per the Final Rule published at 72 Fed. Reg. 68700 *et seq.* (December 5, 2007). Please select the method of education and training that your organization chose to comply with the Final Rule requirement:

- Conducted our own education and training per 42 C.F.R. 422.504 (b) (4) (vi) (c).
- Took training and education provided by a MA and/or Part D Sponsor or other organization.
- Took training and education provided by Midwest Health Plan.

Signature attests that your organization has completed appropriate education and training to identify, correct and prevent potential fraud, waste and abuse, and your organization will furnish upon request to Midwest Health Plan training logs to validate that training was completed. In addition, your organization will obtain attestations from other entities that provide health, prescription and/or administrative services on behalf of Midwest Health Plan Medicare Advantage beneficiaries, and upon request obtain training logs to verify that fraud, waste and abuse training was completed by those entities.

\_\_\_\_\_ (signature)

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

Please return this completed attestation by March 31, 2010 to:

Kathleen M. Harkness, RN, MS, CPHQ  
Sr. Director of Corporate Quality  
Midwest Health Plan  
5050 Schaefer Road  
Dearborn, MI 48126  
Fax: 313-581-2780

**EXHIBIT B**

**TRAINING LOG**

Employee Name – Print	Employee Signature	Name of Training (e.g., MHP)	Date of Training	Manager's Initials

## **EXHIBIT C**

### **RESOURCES**

The following federal government websites are sources of information regarding fraud, waste and abuse education, detection, correction and prevention:

*Department of Health and Human Services, Office of Inspector General*

<http://www.oig.hhs.gov/hotline.html>

*Centers for Medicare & Medicaid Services*

[http://www.cms.hhs.gov/MLNProducts/downloads/110107\\_Medicare\\_Fraud\\_and\\_Abuse\\_brochure.pdf](http://www.cms.hhs.gov/MLNProducts/downloads/110107_Medicare_Fraud_and_Abuse_brochure.pdf)

<http://www.medicare.gov/FraudAbuse/HowToReport.asp>