

Compliance Corner

The Government Programs Compliance Newsletter
May 2014

In this issue:

- Introduction
- 2014 Compliance Program
- Personnel Corrective Action
- Disclosure & Non-Retaliation
- FWA & OIG Exclusion List



PacificSource's government programs headquarter, Bend, OR

compliance violation occurs. Please refer to [Policy Number C-5](#) for detail.

COMPLIANCE PROGRAM & STANDARDS OF CONDUCT

We recently updated our [2014 Compliance Program & Standards of Conduct](#). The document was reviewed and approved by the Compliance Committee and Board of Directors. As a delegated vendor, you will be required to certify that your employees have read it as part of your 2014 annual compliance training. Look for an official letter from us sometime in summer 2014.

DISCLOSURE & NON-RETALIATION POLICY

As a PacificSource 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 PacificSource 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. Please refer to [Policy Number C-4](#) for detail.

COMPLIANCE INTRODUCES NEW VENDOR NEWSLETTER

The Government Programs Compliance Department is excited to roll out our first newsletter to our business partners and vendors. The Compliance Corner is a quarterly article that will raise compliance awareness, provide training and education, and encourage and promote the reporting of compliance and fraud, waste and abuse (FWA) issues.

PERSONNEL CORRECTIVE ACTION

We would like to remind our business partners that PacificSource maintains a Personnel Corrective Action Policy. The policy articulates the various levels of personnel action that may occur when a

If you suspect that someone has committed a potential compliance or FWA act, you must report the incident immediately to your PacificSource contract administrator, or any member of the Compliance Department. You may also report anonymously by calling (888) 265-4068 or going [Online](#). 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.

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INTRODUCTION TO FWA

What is fraud, waste and abuse? Commonly referred to as FWA, it is a government term used to describe 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 PacificSource contact. We will conduct a thorough investigation and take appropriate actions.

OIG EXCLUSION LIST

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. As a business partner who handles Medicare and/or Medicaid business for PacificSource, you are required to screen your

employees against the list prior to hire, and monthly thereafter. Employees found to be on the list must, at a minimum, be removed from working on any Medicare/Medicaid related activities.

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WHAT'S IN NEXT QUARTERLY ARTICLE

In the next quarterly article, we will cover:

- What is a first-tier, downstream or related (FDR) entity and your obligation as an FDR
- The corporate infrastructure of our Compliance and FWA Program
- Introduction to our compliance team
- Overview of State and Federal regulatory agencies and laws
- More examples of FWA

[AIM](#), [Altegra](#), [Architrave](#), [Censeo](#), [WEBCO](#), [COIPA](#), [COIC](#), [Caremark](#), [Eastern ID IPA](#), [eHealth](#), [IPN](#), [Ipsos Synovate](#), [Medical & Surgical Specialists](#), [MCCFL](#), [MCCOG](#), [NwRA](#), [NVA](#), [Oliver Wyman](#), [Outcomes](#), [PH Tech](#), [PCCA](#), [PrimeCare](#), [RBH](#), [Valley Health Network](#), Direct-contract providers, Independent agents/brokers

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