

Training Regulations

2013 Annual FWA Training for Network Pharmacies

The Centers for Medicare & Medicaid Services (CMS) requires that pharmacies complete annual Fraud, Waste and Abuse (FWA) training. The annual training is a CMS requirement per Federal Regulations (42 C.F.R. §§ 422.503(b)(4)(vi)(C) and 423.504(b)(4)(vi)(C)) and CVS Caremark Part D Services (Caremark) is responsible for ensuring that all pharmacies in its Medicare Part D network comply with the requirement. Caremark therefore requires that all contracted Medicare Part D network pharmacies complete training each year on behalf of its Medicare Part D Prescription Drug Plan (PDP) Plan Sponsors.

Providers must complete Medicare Part D FWA training, including submission of a written attestation to Caremark verifying completion of the requirement. ***The training and attestation must be completed by December 31 each year to meet the current year's requirement.*** Failure to comply with this requirement will result in your non-compliance with your network agreement and could subject you to fines and/or disciplinary action up to and including termination of your contract for participation in the Med D network.

The following general information will assist your pharmacy to complete the training and attestation correctly and in a timely manner:

Caremark provides pharmacies an on-line website training and attestation process. *Pharmacies will be notified each year by Caremark when the updated training and attestation for the current year are available.* Fraud, Waste and Abuse training and attestation materials can be accessed on-line at:

www.Caremark.com/PharmInfo or www.caremark.com > For Pharmacists and Medical Professionals (lower left) > Medicare Part D Compliance / Fraud, Waste and Abuse Training for Pharmacy Staff

The website contains:

- The "CVS Caremark Code of Conduct" (PDF)
- "CMS FWA and General Compliance Training" Module (PDF)
- "CVS Caremark Pharmacy eAttestation of Completed FWA Training"
- Training Regulations

If your pharmacy/organization has been officially accredited as a supplier of Durable Medical Equipment, Prosthetics, Orthotics and Supplies (DMEPOS) by a CMS-deemed accreditation organization (AO) and therefore waived from participating in additional FWA training per 42 C.F.R. § 423.504(b)(4)(vi)(C)(3), you must attest to your accreditation by accessing the same link provided above and complete the

- "CVS Caremark Pharmacy eAttestation of Completed FWA Training"

Documentation confirming Provider's completed training (or DMEPOS accreditation) should be readily available to Caremark, upon request, for audit purposes.

General Timeline for Annual FWA Training and Attestation

August-September	Caremark notifications sent to pharmacies discussing training requirements and timeframe of on-line availability of materials
October-December	Pharmacies complete training and attestation by December 31
November-December	Caremark reminder notifications sent to pharmacies
December 31, 2013*	Pharmacies must complete training and attestation for the current year by this date
January 2014	Caremark notifications sent to nonresponsive pharmacies (for the prior year)

Pharmacies that have not completed training and attested to Caremark by December 31 may be assessed a noncompliance fee. See the **Noncompliance subsection within the **Professional Audit** section [or **Fraud, Waste and Abuse (FWA) Annual Training** subsection in the **Medicare Part D** section] of the Provider Manual for more information.*

Top Questions Asked by Providers

- **Where do I find the training materials on your website?** Once you have accessed the CVS Caremark Pharmacy Webpage (www.Caremark.com/PharmInfo), scroll down to the lower left-hand of the page. There you will find a Section titled Medicare Part D Compliance / Fraud, Waste, and Abuse Training for Pharmacy Staff, which includes the CVS Caremark Code of Conduct, the CMS FWA and General Compliance Training Module, and the on-line eAttestation for Completed 2013 FWA Training.
- **My pharmacy is accredited as a Medicare Part D Provider. Do I still have to take this training?** If your pharmacy/organization has been officially accredited as a supplier of Durable Medical Equipment, Prosthetics, Orthotics and Supplies (DMEPOS) by a CMS-deemed accreditation organization (AO), the FWA portion of your training obligation is waived. **However, you must still attest to your accreditation, using the on-line Attestation, and you are still required to complete General Compliance Training per 423.504(b)(4)(vi)(C)(3).**
- **Can I use Compliance and FWA training from a different Sponsor or entity?** Yes, as long as the training materials meet CMS requirements for both FWA and General Compliance per 42 C.F.R. § 422.503(b)(4)(vi)(C) and § 423.504(b)(4)(vi)(C). However, pharmacies may not develop their own training materials.
- **My pharmacy does not process Medicare Part D prescriptions or submit Medicare Part D claims. Is the pharmacy still required to take this training?** Although we encourage all pharmacies to take Compliance / FWA training, if your pharmacy does not process Medicare Part D prescriptions or submit Medicare Part D claims, you are not required to take the training at this time.
- **I have already completed FWA training for my pharmacy. Do I need to complete Caremark's on-line Attestation?** Yes. You **must submit the online Attestation** to Caremark confirming completion of training in 2013..

- **Once I have completed the on-line attestation, how do I know if Caremark has received the information?** At the end of the on-line attestation, you may enter an e-mail address and have a copy of the attestation sent to you. Once you submit the on-line attestation, you may also print a copy of the confirmation screen. Please keep a copy for your records.
- **How long do I need to maintain training records?** As part of the Part D Addendum of your pharmacy's Service Agreement with CVS Caremark, you have agreed to document your training with materials, attendance logs, date of training, names of trainers and any other information related to the training and maintain these records for a period of ten (10) years, and, upon request, to provide CVS Caremark with copies of these training records for audit purposes.
- **If my pharmacy staff identifies suspected non-compliance or fraud, waste or abuse, how do I report it?** The CVS Caremark Code of Conduct describes the Compliance Program and provides additional resources for reporting issues, including:
 - Ethics Line: 1-877-CVS-2040
 - Confidential Ethics e-mail: Ethics.BusinessConduct@cvs.com
 - Fraud Hotline: 1-888-277-4149
 - Confidential Fraud e-mail: MedicareFraud@caremarkrx.com
 - Privacy / Security: Privacy.Officer@cvscaremark.com
- Remember, you have an assurance of anonymity and non-retaliation in the reporting process, and confidentiality to the extent reasonably possible.

Pharmacy Checklist for Annual Medicare Part D FWA Training and Attestation

Providers must complete Medicare Part D FWA training, including submission of the on-line eAttestation to Caremark verifying completion of the requirement. ***The training and attestation must be completed by December 31st, 2013 to meet the current year's requirement.***

STEPS:

1. Go to www.Caremark.com/PharmInfo or www.caremark.com > For Pharmacists and Medical Professionals
2. Scroll to "Fraud, Waste and Abuse Training for Pharmacy Staff"
3. Complete CMS FWA and General Compliance Training Module (or other third party training)
4. Access and complete the "CVS Caremark Pharmacy eAttestation of Completed FWA Training"
5. SUBMIT the eAttestation
6. Print a copy for your records