

MEDICARE PART D PHARMACY TRAINING AND CERTIFICATION REQUIREMENTS



Regulations governing Medicare Part D require all pharmacists and pharmacy staff who provide Part D covered services to receive appropriate Fraud Waste and Abuse (FWA) and Compliance Training, initially upon hire and at least annually thereafter.

Prime Therapeutics (Prime), in conjunction with its Part D Sponsor clients, is required to appropriately track completion of that training among pharmacies in its network. Accordingly, Prime is requiring pharmacies to submit to Prime a Certification that your pharmacy is in compliance with this training requirement. Prime is also making available to you the attached FWA/Compliance Training module, which you may provide your staff to satisfy the training requirement.

Your Responsibilities:

- Complete Fraud, Waste and Abuse (FWA) training program
- Maintain your own internal training logs
- **Complete and submit the attached certification**
https://www.formrouter.net/forms@PRIME/Pharmacy_FWA_Certification_of_Compliance.pdf

What exactly are your FWA training responsibilities? First, you must complete an appropriate FWA training program. Remember that you must maintain your own internal training logs and documentation and those must be available for audit by Prime. We do intend to ask to see the FWA training records when we conduct pharmacy audits in the future. Also, once everyone in the pharmacy who provides Part D covered services has completed FWA training, **the individual who signed the contract between Prime and your pharmacy must complete and submit the online certification on behalf of the entire pharmacy, chain or PSAO.** Only the individual who signed the contract should complete and submit the certification. This may be someone who is not required to complete the training, if they themselves are not providing Part D services.

Your Training Options

- Provide your own training
 - See CFR 422.504(b)(4)(vi)(c) or 423.504(b)(4)(vi)(c) *“Effective training and education between the compliance officer and organization employees, contractors, agents, and directors.”*
- Complete training offered by another Medicare Advantage or Part D Plan Sponsor, or other CMS-approved training

Complete Prime's training program

https://www.brainshark.com/hcsc/Prime_Pharmacy_FWA_Training

Pharmacies may provide their own training to their staff. If you do, you should be familiar with the citation above so that you cover the appropriate material. You must also keep a copy of your training program and have it available for audit purposes along with the training logs.

You may also complete a FWA training program that was offered by another Part D sponsor.

When everyone in your pharmacy whom ***you*** have determined may come in contact with a Medicare Advantage/Part D patient has completed this or a comparable FWA training program, please return to the Prime website to complete the on-line certification form. You must complete this Certification by **December 31, 2009** to be in compliance.

Links

Prime Therapeutics Pharmacy Training

https://www.brainshark.com/hcsc/Prime_Pharmacy_FWA_Training

Training Certification

https://www.formrouter.net/forms@PRIME/Pharmacy_Certification_of_Compliance.pdf

Other Links:

- CMS Prescription Drug Benefit Manual Chapter 9

www.cms.hhs.gov/prescriptiondrugcovcontra/downloads/PDBManual_Chapter9_FWA.pdf

- Prime Code of Conduct

<http://www.primetherapeutics.com/pdf/CodeOfConduct.pdf>