

Department: Pharmacy

Policy Number: HHS-8135-PH

Attachments: \_\_\_\_\_

Policy Title: Pharmacy CMS Medicare Part D Date: 7/12

Revised: \_\_\_\_\_ Reviewed: 12/12

Approved by:  Date: 12/12/12

**POLICY**

It is the policy of the Clinic Pharmacy to follow all requirements as listed by the Centers of Medicare & Medicaid Services

**PURPOSE**

The purpose of the policy is follow all requirements in order to process and handle Medicare and Medicaid patients for their prescription requirements.

**PROCEDURE**

**Code of Conduct:**

Our intention in all pharmacy processing is to assure that all aspects involving Fraud, Waste, and Abuse as defined by Medicare Part D are followed to the fullest.

Any known violation will be reported as outlined by Medicare Compliance in regards to Fraud, Waste, and Abuse.

All employees will complete Information Systems Security Awareness training required by E.H.R. as well as annual renewal of a Medicare certified course in Fraud, Waste, and Abuse. A record of training will be kept in the pharmacy including the employees name, date, specific sponsor, and date of training completion.

**Exclusion Review:**

Prior to hire, all employees will be screened for acceptance through review by the Office of Inspector General (OIG) and General Services Administration (GSA) exclusions lists. This function will be performed by the Director of Pharmacy.

If any employee is identified to be on such lists, that employee will immediately be removed from any work related directly or indirectly to all Federal health care programs and the entity will take appropriate corrective actions.

**Compliance Oversight:**

All policies and procedures in place will be adhered to including prompt response to any identified compliance deficiencies in accordance with CMS rules, regulations, and guidance.

**Compliance Training:**

All pharmacy employees will undergo annual Medicare Compliance training. A record of completion will be kept in the pharmacy including the employees name, date, specific sponsor, and date of training completion.