



FRAUD, WASTE AND ABUSE POLICY

Advocate Employees:

All Employees are required to take AHIP within the first 90 days of hire and each calendar year thereafter which includes Fraud, Waste and Abuse (FWA) and Compliance Training*.

The training covers the following:

- How to identify FWA
- An overview of the industry efforts in detecting fraud
- Legal tools to combat FWA
- Understand both the human and financial cost of FWA
- Review CMS FWA training requirements
- Who commits FWA
- Reporting FWA; loopholes and obligations

Temporary Employees/Non-Licensed Personnel:

FWA and Compliance training may also be administered through the CMS provided materials from:

<https://www.cms.gov/Outreach-and-Education/MLN/WBT/MLN3995723-MLNPartsCD/FWA/story.html>

*If under special circumstance AHIP is not administered, FWA training will be provided internally

Instructions for FWA Reporting

Report Compliance, Privacy/Security, Ethical and Fraud, Waste, and Abuse Issues:

You are required by CMS to report compliance or fraud, waste, or abuse issues as well as to assist in the resolution of reported issues. If you identify any issue involving compliance or fraud, waste, or abuse, please report it through one of the following ways:

Alert our Compliance team in-person at one of our offices, via email at compliance@advocatehealthllc.com or call 1-800-709-5513 and ask for our Compliance Officer, Alissa Morris. All calls and e-mails are confidential and may be anonymously reported.



When someone commits fraud against Medicare, it affects everyone. If you suspect insurance fraud against Advocate Health Advisors, a Health Plan, Medicare beneficiary, or think you may be a victim, please report the suspicious activity.

For more information about insurance fraud, visit www.insurancefraud.org.

Advocate Health Advisors is required to report compliance concerns and suspected or actual violations related to the Medicare program and FWA violations to our sponsors, via their hotline or email.

Non-retaliation Policy:

A key part of Advocate Health Advisors is our policy of non-retaliation and non-intimidation for individuals who report a Medicare Compliance or fraud, waste or abuse concern. You can rely on our commitment of non-retaliation and non-intimidation when you report a potential concern in good faith.

- **Anonymous Reporting** – Communication to the Compliance Department can be made anonymously through the Fraud, Waste and Abuse Reporting form, phone, or email. Advocate Health Advisors requests that if a reporter desires to remain anonymous, he/she provide enough information to allow Advocate to investigate the issue.
- **Prohibition Against Intimidation and/or Retaliation** – Advocate Health Advisors strictly prohibits intimidation and/or retaliation against anyone who, in good faith, reports a detected or suspected violation of Medicare compliance, ethical standards or FWA. Any individual who retaliates against or intimidates an individual who, in good faith, reports a compliance or fraud, waste, or abuse concern is subject to disciplinary action up to, and including, termination.