

Fraud, Waste and Abuse (FWA) and General Compliance Training Attestation & Log

Send the signed attestation and completed training log to the PharmPix Compliance Department at ppxcompliance@pharmpix.com.

PharmPix contracted network provider pharmacies are required to sign this attestation to satisfy mandatory compliance requirements for federal government-sponsored health care programs, as well as related guidance issued by the Centers for Medicare & Medicaid Services (CMS). CMS has set forth express guidance in the Federal Register and in Title 42 of the Code of Federal Regulations (CFR), Parts 422, 423, 425 and 438, among others, and in other agency guidance requiring plan sponsors and their first tier, downstream, and related (FDR) entities to demonstrate compliance with the following:

The Contracted Network Provider Pharmacy hereby verifies and certifies that it has conducted satisfactory annual Fraud, Waste and Abuse (FWA) and general compliance training for pharmacy staff, or has used the training program provided by CMS. The Contracted Network Provider Pharmacy further verifies and certifies that neither it nor its employees have been excluded from participation in federal health care programs, as confirmed by checking the federal program exclusion lists maintained by the General Services Administration (GSA) and the Department of Health and Human Services Office of Inspector General (HHS-OIG). The pharmacy has reviewed the HHS-OIG and GSA lists prior to hiring or contracting, and monthly thereafter, for its current employees, contractors, health professionals, and vendors who work on federal government-sponsored programs (including, among others, Medicare Advantage (MA), Part D, and Medicaid) to ensure that none are excluded from participating in these programs. These lists are available at the following sites:

Federal Program Exclusion List	Website
Office of Inspector General (OIG) List of Excluded Individuals/Entities (LEIE)	https://exclusions.oig.hhs.gov/
General Services Administration (GSA) System for Award Management (SAM) (includes the former Excluded Parties List System, EPLS)	https://sam.gov/
National Practitioner Data Bank (NPDB) (includes the former Healthcare Integrity and Protection Data Bank)	https://www.npdb.hrsa.gov/

The Contracted Network Provider Pharmacy hereby verifies and certifies that attendance logs, materials, training documents, and other evidence in support of compliance with item 1 above are, and shall continue to be, made available by the Contracted Network Provider Pharmacy for inspection and review by PharmPix during on-site audits or other review processes. This inspection may also be conducted by the payer(s) and other federal regulatory agencies as outlined in regulations including, but not limited to, 42 CFR 422.504(e) and 422.503(d)(2).

Note: CMS requires that records demonstrating compliance with these requirements be maintained for ten (10) years. Records must list all individuals trained, the date the FWA and general compliance training was provided or completed, and the date of the HHS-OIG/GSA exclusion monitoring review.

Pharmacy Name

NCPDP Number

Pharmacy NPI

Phone Number

Date

Name of Authorized Individual Completing Attestation

Title of Authorized Individual Completing Attestation

Signature

Fraud, Waste and Abuse (FWA) and General Compliance Training Log

Pharmacy Name

List all training materials provided and attach a copy of each to this log:

Employee Name	Title	Date Provided

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