

Humana pharmacy compliance

CMS and Humana's Medicaid contracts mandate that all those contracted with Humana or Humana subsidiaries to provide or support health care services for Humana's Medicare and/or dual Medicare-Medicaid members, including pharmacies, complete compliance program requirements.

The information below is provided to help health care providers complete these requirements:

Frequently Asked Questions and Answers

This document provides additional information regarding the compliance requirements and Web access.

<http://apps.humana.com/marketing/documents.asp?file=1827553>

Humana's compliance program requirements for contracted pharmacy providers also include, but are not limited to:

1. Monitoring and auditing the compliance of subcontractors that provide services or support related to administrative or health care services provided to a member of a Humana Medicare Advantage or Prescription Drug Plan.
2. Obtaining approval from Humana for relationships with downstream entities. In addition, note that Humana must notify CMS of any location outside of the United States or a United States territory that receives, processes, transfers, stores or accesses Medicare member protected health information in oral, written or electronic form.
3. Having policies and procedures in place for preventing, detecting, correcting and reporting FWA, including, but not limited to:
 - a. Requiring employees and subcontractors to report suspected and/or detected FWA
 - b. Safeguarding Humana's confidential and proprietary information
 - c. Providing accurate and timely information/data in the regular course of business
4. Cooperating fully with any investigation of alleged, suspected or detected violation of the manual, Humana policies and procedures, applicable state or federal laws or regulations and/or remedial actions.
5. Publicizing disciplinary standards to employees and subcontractors.
6. Providing Humana with assurance related to pharmacies' compliance programs upon request.
Please refer to Humana's compliance policy at Humana.com/fraud, as it includes an overview of the seven elements of an effective compliance program.

Humana requires completion of compliance program training and refreshes it at least each calendar year to assist you in meeting these and related requirements. Please complete the training as soon as possible within each calendar year by following the instructions below.

Your training will include review of at least the following materials available at Humana.com/fraud:

- Humana's compliance policy (the definitive source of Humana's compliance program requirements);
- Humana's standards of conduct
- Fraud waste and abuse training* and general compliance training.

* If you are enrolled in the Medicare program or accredited as a durable medical equipment prosthetics, orthotics and supplies supplier, you are deemed to be already compliant with the FWA training requirement and do not need to complete the FWA training. Instead, you may record your deemed status on a Humana attestation form. You must still complete the compliance policy, standards of conduct and general compliance components of the requirements.

Additionally, Humana requires that all pharmacy entities participating in plans for dual Medicare-Medicaid beneficiaries and/or Medicaid beneficiaries, including those contracted with subsidiaries, complete additional training that may cover any or all of the following topics**:

- Cultural competency
- Health, safety and welfare education
- Medicaid pharmacy provider
- Humana orientation.

These trainings are available at humana.com/pharmacy/pharmacists/manuals-forms.

** The number of trainings may vary by state where Humana offers these plans. Humana clarifies this in its attestation form that must be completed and returned to Humana.

Please note that as requirements of Humana may change, Humana reserves the right to require additional or different compliance program training or components, although it strives not to make midyear changes.

If you have training questions that are not addressed in this manual please send an email to **HumanaPharmacyCompliance@humana.com**.

Humana.com instructions

This document covers how to complete the compliance requirements on Humana.com, how to register on Humana.com, how to create a new user, how to assign the compliance business function to another user and how to update an organization's tax identification number (TIN):

<http://apps.humana.com/marketing/documents.asp?file=1827566>

If your organization is unable to register on Humana.com, refer to the following document: Compliance requirements for health care providers who are unable to register

<http://apps.humana.com/marketing/documents.asp?file=1827579>

Humana pharmacy credentialing

URAC requires all network pharmacies to be credentialed at the time of contracting and to be recredentialed every three years. The recredentialing request is sent to the pharmacy via fax and requires the pharmacy to return a recredentialing application, as well as the following:

- Pharmacy state licensure information
- Pharmacy U.S. Drug Enforcement Agency (DEA) licensure information
- Nonsanction attestation
- Copy of current professional liability insurance (PLI) coverage that meets or exceeds a minimum requirement of \$1 million in aggregate

Participating pharmacies that fail to meet Humana's required standards will be removed from Humana's pharmacy network.

Conflicts of interest

All entities and individuals supporting Humana business are required to avoid conflicts of interest. Pharmacy providers should never offer or provide, directly or indirectly, anything of value—including cash, bribes or kickbacks — to any Humana employee, contractor, representative, agent or customer or any government official in connection with any Humana procurement, transaction or business dealing. This prohibition includes, but is not limited to, a pharmacy provider offering or providing consulting, employment or similar positions to any Humana employee involved with Humana procurement or to that employee's family members or significant others.

Humana pharmacy providers are required to obtain a conflict of interest statement from all employees and subcontractors within 90 days of hire or contract and annually thereafter. This statement certifies that the employee or downstream entity is free from any conflict of interest for administering or delivering federal health care program benefits or services.

All pharmacy providers are required to review potential conflicts of interest and either remove the conflict or, if appropriate, request approval from Humana to continue work despite the conflict.

Humana reserves the right to obtain certifications of the absence of conflicts of interest from all providers and to require that certain conflicts be removed or that the applicable employee(s) and/or downstream entities be removed from supporting Humana.

Pharmacy providers are prohibited from having any financial relationship relating to the delivery of or billing for items or services covered under a federal health care program that:

- Would violate the federal Stark Law, 42 U.S.C. § 1395nn, if items or services delivered in connection with the relationship were billed to a federal health care program, or that would violate comparable state law;
- Would violate the federal Anti-Kickback Statute, 42 U.S.C. § 1320a-7b, if items or services delivered in connection with the relationship were billed to a federal health care program, or that would violate comparable state law; or
- In the judgment of Humana, could reasonably be expected to influence a provider to utilize or bill for items or services covered under a federal health care program in a manner that is inconsistent with professional standards or norms in the local community.
- Pharmacy providers are subject to termination by Humana for violating this prohibition. Humana reserves the right to request information and data to ascertain ongoing compliance with these provisions.