



Fraud, Waste & Abuse (FWA) Training Attestation FAQ

Q. Why is my pharmacy being asked to complete FWA through NCPDP?

A. NCPDP, through the collaboration of the pharmacy, Part D sponsor and PBM community, has developed a solution that will allow pharmacies to complete the standardized FWA attestation online through the NCPDP website. NCPDP will then send the pharmacy's FWA attestation to Part D sponsors and PBM's who subscribe to the NCPDP dataQ® file.

Q. Will my pharmacy be required to complete the FWA attestation directly with PBMs and Part D sponsors?

A. Possibly, NCPDP is working with PBM's and Part D sponsors to adopt the dataQ® file that contains the pharmacy's FWA attestation. For 2016, some Part D Sponsors and PBM's may not be ready to accept the NCPDP dataQ® file and the pharmacy will need to attest to FWA training directly with the PBM or Part D sponsor. For those PBM's and Part D sponsors that adopt the dataQ® file in 2016, pharmacies will not need to attest for FWA with those entities provided the pharmacy has completed the FWA attestation through the NCPDP website.

Q. Will my PSAO or GPO be able to complete my FWA attestation through NCPDP?

A. No, pharmacies will need to use their login to access the individual FWA attestation online.

Q. Will my chain of pharmacies be able to sign the FWA attestation once for all pharmacy locations?

A. Yes, provided each NCPDP is affiliated under the chain code. For chains with multiple chain codes, the FWA attestation will need to be completed once for each chain code.

Q. Is the FWA attestation similar to the FWA attestations I have signed in the past?

A. Yes, the language in the FWA attestation was developed in coordination with many PBM's, Part D sponsors and members of the pharmacy community for a uniform that document that would be used by parties subject to Part D regulations.

Q. How will signing the FWA attestation online through NCPDP benefit my pharmacy?

A. The goal is for the pharmacy to sign the FWA attestation once per year and not for every Part D sponsor or PBM. This process will greatly improve pharmacy tracking for FWA completion eliminating the need to ensure that pharmacies have completed all of the FWA attestations that are required by all Part D sponsors and PBM's.

Q. If I have already completed some of the FWA attestations with Part D sponsors or PBM's for 2016, am I still required to complete the NCPDP FWA attestation?

A. Possibly, if any of those Part D sponsors and PBM's adopt the NCPDP file to obtain their pharmacy FWA Attestations during 2016, they will need to have your pharmacy's completed FWA attestation on file to comply with the Centers for Medicare and Medicaid Services (CMS).

Q. Why am I being asked about Offshore Vendor use in my pharmacy?

- A. The CMS requires Part D sponsors to report if any of the pharmacies in their network are using offshore vendors for the purposes of administering drugs to Medicare customers. Pharmacies may be using offshore vendors for the purpose of IT support or help desk support. Any offshore vendor is subject to CMS regulations relating to the dispensing of Part D drugs.