DEPARTMENT OF HEALTH AND HUMAN SERVICES Centers for Medicare & Medicaid Services





Medicare Fraud & Abuse:

Prevention, Detection, and Reporting



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Please note: The information in this publication applies to the Medicare Fee-For-Service Program (also known as Original Medicare). Many of the laws discussed apply to all Federal Health Care Programs (including Medicaid and Medicare Managed Care).

Table 5. Hyperlink Table, at the end of this document, provides the complete URL for each hyperlink.

You Can Help Fight Fraud — Report It!

The Office of Inspector General (OIG) Hotline accepts tips and complaints from all sources on potential fraud, waste, and abuse. View instructional videos about the OIG Hotline operations, as well as reporting fraud to the OIG.

Medicare Fraud and Abuse: A Serious Problem That Needs Your Attention

Although no precise measure of health care fraud exists, those intent on abusing Federal health care programs can cost taxpayers billions of dollars while putting beneficiaries' health and welfare at risk. Medicare fraud and abuse increases the financial strain on the Medicare Trust Fund. The impact of these losses and risks magnifies as Medicare continues to serve a growing number of people.

You play a vital role in protecting the integrity of the Medicare Program. To combat fraud and abuse, you need to know how to protect your organization from engaging in abusive practices and civil or criminal activity. This publication provides the following tools to help protect the Medicare Program, your patients, and yourself:

- Medicare fraud and abuse examples
- Overview of the laws used to fight fraud and abuse
- Descriptions of the partnerships among government agencies dedicated to preventing, detecting, and fighting fraud and abuse
- Resources on how to report suspected fraud and abuse

What Is Medicare Fraud?

Medicare fraud typically includes any of the following:

- Knowingly submitting, or causing to be submitted, false claims or making misrepresentations of fact to obtain a Federal health care payment for which no entitlement would otherwise exist
- Knowingly soliciting, receiving, offering, and/or paying remuneration to induce or reward referrals for items or services reimbursed by Federal health care programs
- Making prohibited referrals for certain designated health services

Case Studies

To learn about real-life cases of Medicare fraud and abuse and the consequences for culprits, visit the <u>Stop Medicare</u> <u>Fraud Newsroom</u>. Anyone can commit health care fraud. Fraud schemes range from solo ventures to broad-based operations by an institution or group. Even organized crime has infiltrated the Medicare Program and masqueraded as Medicare providers and suppliers. Examples of Medicare fraud include:

- Billing Medicare for appointments the patient failed to keep
- Knowingly billing for services at a level of complexity higher than services actually provided or documented in the file
- Knowingly billing for services not furnished, supplies not provided, or both, including falsifying records to show delivery of such items
- Paying for referrals of Federal health care program beneficiaries

Defrauding the Federal Government and its programs is **illegal**. Committing Medicare fraud exposes individuals or entities to potential criminal and civil liability, and may lead to imprisonment, fines, and penalties. Criminal and civil penalties for Medicare fraud reflect the serious harms associated with health care fraud and the need for aggressive and appropriate intervention. Providers and health care organizations involved in health care fraud risk exclusion from participating in all Federal health care programs and risk losing their professional licenses.

What Is Medicare Abuse?

Abuse describes practices that, either directly or indirectly, result in unnecessary costs to the Medicare Program. Abuse includes any practice not consistent with providing patients with services that are medically necessary, meet professionally recognized standards, and are priced fairly.

Examples of Medicare abuse include:

- Billing for unnecessary medical services
- Charging excessively for services or supplies
- Misusing codes on a claim, such as upcoding or unbundling codes

Medicare abuse can also expose providers to criminal and civil liability.

Program integrity encompasses a range of activities targeting various causes of improper payments. Figure 1 shows examples along the spectrum of causes of improper payments.

Figure 1. Types of Improper Payments*



* The types of improper payments in Figure 1 are examples for educational purposes. Providers who engage in incorrect coding, ordering excessive diagnostic tests, upcoding, or billing for services or supplies not provided may be subject to administrative, civil, or criminal liability.

Medicare Fraud and Abuse Laws

Federal laws governing Medicare fraud and abuse include all of the following:

- False Claims Act (FCA)
- Anti-Kickback Statute (AKS)
- Physician Self-Referral Law (Stark Law)
- Social Security Act
- United States Criminal Code

These laws specify the criminal, civil, and administrative remedies the government may impose on individuals or entities that commit fraud and abuse in the Medicare Program, including Medicare Parts C and D and the Medicaid Program. Violating these laws may result in nonpayment of claims, Civil Monetary Penalties (CMPs), exclusion from all Federal health care programs, and criminal and civil liability. We briefly summarize each law below, and you can find hyperlinks to the text of the laws at the end of this section in Table 1.

CMP Inflation Adjustment

In 2016, the Federal Government adjusted all CMPs for inflation. These adjusted amounts apply to civil penalties assessed after August 1, 2016, whose associated violations occurred after November 2, 2015. Future inflation adjustments will occur annually, at the beginning of each calendar year.

Federal False Claims Act (FCA)

The FCA protects the Federal Government from being overcharged or sold substandard goods or services. The FCA imposes civil liability on any person who **knowingly** submits, or **causes** the submission of, a false or fraudulent claim to the Federal Government. The terms "knowing" and "knowingly" mean a person has actual knowledge of the information or acts in deliberate ignorance or reckless disregard of the truth or falsity of the information related to the claim. No proof of specific intent to defraud is required to violate the civil FCA.

Example: A physician knowingly submits claims to Medicare for a higher level of medical services than actually provided or higher than the medical record documents.

Penalties: Civil penalties for violating the FCA may include fines of up to **three** times the amount of damages sustained by the Government as a result of the false claims plus up to \$21,563 (in 2016) per false claim filed.

There also is a criminal FCA statute by which individuals or entities that submit false claims may face fines, imprisonment, or both.

Anti-Kickback Statute (AKS)

The AKS makes it a crime to **knowingly and willfully** offer, pay, solicit, or receive any remuneration directly or indirectly to induce or reward referrals of items or services reimbursable by a Federal health care program.

Example: A provider receives cash or below fair market value rent for medical office space in exchange for referrals.

Penalties: Civil penalties for violating the AKS may include penalties of up to \$73,588 (in 2016) per kickback plus **three** times the amount of the kickback. Criminal penalties for violating the AKS may include fines, imprisonment, or both.

If certain types of arrangements satisfy regulatory safe harbors, they may not violate the AKS.

Physician Self-Referral Law (Stark Law)

The Physician Self-Referral Law, often called the Stark Law, prohibits a physician from making a referral for certain designated health services payable by Medicare or Medicaid to an entity in which the physician (or an immediate family member) has an ownership/investment interest or with which he or she has a compensation arrangement, unless an exception applies.

Example: A provider refers a beneficiary for a designated health service to a business in which the provider has an investment interest.

Penalties: Penalties for physicians who violate the Stark Law may include fines, CMPs up to \$23,863 (in 2016) for each service, repayment of claims, and potential exclusion from all Federal health care programs.

Anti-Kickback Statute vs. Stark Law

Refer to the Comparison of the Anti-Kickback Statute and Stark Law handout.

What Is an Entity?

Refer to the <u>Code of</u> <u>Federal Regulations</u> (CFR) for more information about the definition of an entity.

Criminal Health Care Fraud Statute

The Criminal Health Care Fraud Statute prohibits **knowingly and willfully** executing, or attempting to execute, a scheme or artifice in connection with the delivery of or payment for health care benefits, items, or services to either:

- Defraud any health care benefit program
- Obtain (by means of false or fraudulent pretenses, representations, or promises) any of the money or property owned by, or under the control of, any health care benefit program

Example: Several doctors and medical clinics conspire in a coordinated scheme to defraud the Medicare Program by submitting claims for power wheelchairs that were not medically necessary.

Penalties: Penalties for violating the Criminal Health Care Fraud Statute may include fines, imprisonment, or both.

Additional Medicare Fraud and Abuse Penalties

Aside from the civil and criminal actions brought by law enforcement agencies, the Medicare Program has additional administrative remedies applicable for certain fraud and abuse violations.

Exclusions

Under the Exclusion Statute, the OIG must exclude from participation in all Federal health care programs any providers and suppliers convicted of any of the following:

- Medicare fraud, as well as any other offenses related to the delivery of items or services under Medicare
- Patient abuse or neglect
- Felony convictions for other health care-related fraud, theft, or other financial misconduct
- Felony convictions for unlawful manufacture, distribution, prescription, or dispensing of controlled substances

OIG also has discretion to impose permissive exclusions on other grounds, including:

- Misdemeanor convictions related to health care fraud other than Medicare or Medicaid fraud, or misdemeanor convictions in connection with the unlawful manufacture, distribution, prescription, or dispensing of controlled substances
- Suspension, revocation, or surrender of a license to provide health care for reasons bearing on professional competence, professional performance, or financial integrity

- Provision of unnecessary or substandard services; submission of false or fraudulent claims to a Federal health care program
- Engaging in unlawful kickback arrangements
- Defaulting on health education loan or scholarship obligations

Excluded providers may not participate in Federal health care programs for a designated period. An excluded provider may not bill Federal health care programs (including, but not limited to, Medicare, Medicaid, and State Children's Health Insurance Program [SCHIP]) for services he or she orders or performs. Additionally, an employer or a group practice may not bill for an excluded provider's services. At the end of an exclusion period, an excluded provider must seek reinstatement; reinstatement is not automatic. The OIG maintains a list of excluded parties called the List of Excluded Individuals/Entities (LEIE).

Civil Monetary Penalties Law

The Civil Monetary Penalties Law authorizes the imposition of CMPs for a variety of health care fraud violations. Different amounts of penalties and assessments may be authorized based on the type of violation. Penalties range from \$21,563 to \$73,568 (in 2016) per violation. CMPs also may include an assessment of up to **three** times the amount claimed for each item or service, or up to **three** times the amount of remuneration offered, paid, solicited, or received. Violations that may justify CMPs include:

- Presenting a claim you know, or should know, is for an item or service not provided as claimed or that is false and fraudulent
- Presenting a claim you know, or should know, is for an item or service for which Medicare will not pay
- Violating the AKS

Table 1. Table of Statutes

Statute	Reference
Civil FCA 31 United States Code (U.S.C.) Sections 3729-3733	https://www.gpo.gov/fdsys/pkg/USCODE-2015-title31/pdf/ USCODE-2015-title31-subtitleIII-chap37-subchapIII.pdf
	Civil Monetary Penalties Inflation Adjustment https://www.gpo.gov/fdsys/pkg/FR-2016-06-30/pdf/2016- 15528.pdf
Criminal FCA 18 U.S.C. Section 287	https://www.gpo.gov/fdsys/pkg/USCODE-2015-title18/pdf/ USCODE-2015-title18-partI-chap15-sec287.pdf
AKS 42 U.S.C. 1320a-7b(b)	https://www.gpo.gov/fdsys/pkg/USCODE-2015-title42/pdf/ USCODE-2015-title42-chap7-subchapXI-partA-sec1320a- 7b.pdf
Regulatory Safe Harbors 42 Code of Federal Regulations (CFR) Section 1001.952	https://www.gpo.gov/fdsys/pkg/CFR-2015-title42-vol5/pdf/ CFR-2015-title42-vol5-sec1001-952.pdf
Physician Self-Referral Law 42 U.S.C. Section 1395nn	https://www.gpo.gov/fdsys/pkg/USCODE-2015-title42/pdf/ USCODE-2015-title42-chap7-subchapXVIII-partE-sec 1395nn.pdf
Criminal Health Care Fraud 18 U.S.C. Section 1347	https://www.gpo.gov/fdsys/pkg/USCODE-2015-title18/pdf/ USCODE-2015-title18-partI-chap63-sec1347.pdf
Exclusion 42 U.S.C. Section 1320a-7	https://www.gpo.gov/fdsys/pkg/USCODE-2015-title42/pdf/ USCODE-2015-title42-chap7-subchapXI-partA-sec 1320a-7.pdf
Civil Monetary Penalties Law 42 U.S.C. Section 1320a-7a	https://www.gpo.gov/fdsys/pkg/USCODE-2015-title42/pdf/ USCODE-2015-title42-chap7-subchapXI-partA-sec1320a- 7a.pdf Adjustment of Civil Monetary Penalties for Inflation https://www.gpo.gov/fdsys/pkg/FR-2016-09-06/pdf/2016- 18680.pdf

Medicare Fraud and Abuse Partnerships

Government agencies partner to fight fraud and abuse, uphold the Medicare Program's integrity, save and recoup taxpayer funds, reduce health care costs, and improve the quality of care.

Public-Private Health Care Fraud Prevention Partnership

The <u>Public-Private Partnership to Prevent Health Care Fraud</u> (Partnership) is a public-private forum for the Federal Government and private and State organizations, including insurers, to prevent health care fraud on a national scale. Public and private sector partners exchange information and best practices to detect and prevent fraudulent claims and payments. The Partnership also analyzes industry-wide data to help detect and predict fraud schemes.

Centers for Medicare & Medicaid Services (CMS)

<u>CMS</u> is the Federal agency within the U.S. Department of Health and Human Services (HHS) that administers the Medicare, Medicaid, SCHIP, Health Insurance Portability and Accountability Act of 1996 (HIPAA), Clinical Laboratory Improvement Amendments (CLIA), and several other health-related programs.

To prevent and detect fraud and abuse, CMS works with individuals, entities, and law enforcement agencies, including:

- Accreditation Organizations (AOs)
- Medicare beneficiaries and caregivers
- Physicians, suppliers, and other health care providers
- State and Federal law enforcement agencies, including the OIG, Federal Bureau of Investigation (FBI), Department of Justice (DOJ), State Medicaid Agencies, and Medicaid Fraud Control Units (MFCUs)

To support its efforts to prevent, detect, and investigate potential Medicare fraud and abuse, CMS also contracts with an array of contractors listed in Table 2.

Contractor	Role
Comprehensive Error Rate Testing (CERT) Contractors	Help calculate the Medicare Fee-For-Service (FFS) improper payment rate by reviewing claims to determine if they were paid properly
Medicare Administrative Contractors (MACs)	Process claims and enroll providers and suppliers
Medicare Drug Integrity Contractors (MEDICs)	Monitor fraud, waste, and abuse in the Medicare Parts C and D Programs
Recovery Audit Program Recovery Auditors	Reduce improper payments by detecting and collecting overpayments and identifying underpayments
Zone Program Integrity Contractors (ZPICs)	Investigate potential fraud, waste, and abuse for Medicare
Formerly called Program Safeguard Contractors (PSCs)	Parts A and B; Durable Medical Equipment Prosthetics, Orthotics, and Supplies; and Home Health and Hospice
Unified Program Integrity Contractor (UPIC)	Will operate under restructured/consolidated Medicare and Medicaid Program Integrity audit and investigation work (Not yet implemented)

Within CMS, the Center for Program Integrity (CPI) promotes the integrity of Medicare through audits, policy reviews, and identifying and monitoring program vulnerabilities. CPI oversees CMS' collaborative interactions with key stakeholders on program integrity issues related to the detecting, deterring, monitoring, and combating fraud and abuse. Visit the <u>CMS Blog</u> for the latest CPI news.

In 2010, HHS and CMS launched an ambitious national effort to obstruct criminals at every step in the act of committing fraud. The Fraud Prevention System (FPS) is the state-of-the-art predictive analytics technology that runs predictive algorithms and other analytics nationwide on all Medicare FFS claims prior to payment. For the first time in Medicare history, CMS systematically applies advanced analytics to the Medicare FFS claims on a streaming, nationwide basis.

In 2012, CMS created the Program Integrity Command Center to bring together Medicare and Medicaid officials, clinicians, policy experts, CMS fraud investigators, and the law enforcement community, including the OIG and FBI. The Command Center gathers these experts to develop and improve intricate predictive analytics that identify fraud and mobilize a rapid fraud response. CMS uses this technology to connect instantly with its field offices and evaluate fraud allegations through real-time investigations. Previously, finding substantiating evidence of a fraud allegation took days or weeks; now it takes mere hours.

Office of Inspector General (OIG)

The OIG protects the integrity of HHS' programs, including Medicare, and the health and welfare of its beneficiaries. The OIG carries out its duties through a nationwide network of audits, investigations, inspections, and other related functions. The Inspector General has the authority to exclude individuals and entities who engage in fraud or abuse from participation in Medicare, Medicaid, and other Federal health care programs and to impose CMPs for certain violations related to Federal health care programs.

Health Care Fraud Prevention and Enforcement Action Team (HEAT)

The DOJ and HHS established HEAT to build and strengthen existing programs combatting Medicare fraud while investing new resources and technology to prevent fraud and abuse. HEAT efforts included expanding the DOJ-HHS Medicare Fraud Strike Force, which successfully fights fraud. HEAT created the <u>Stop Medicare Fraud</u> website, which provides information about how to identify and protect against Medicare fraud and how to report it.

General Services Administration (GSA)

The GSA consolidated several Federal procurement systems into one new system—the <u>System for Award Management</u> (SAM). SAM incorporated the formerly maintained Excluded Parties List System (EPLS). SAM includes information on entities that are:

- Debarred or proposed for debarment
- Disqualified from certain types of Federal financial and non-financial assistance and benefits
- Disqualified from receiving Federal contracts or certain subcontracts
- Excluded
- Suspended

Report Suspected Fraud

The following table tells you how to report Medicare fraud.

If You Are a…	Report Fraud to
Medicare Beneficiary	For any complaint:
	CMS Hotline:
	Phone: 1-800-MEDICARE (1-800-633-4227) or TTY 1-877-486-2048 AND
	OIG Hotline:
	Phone: 1-800-HHS-TIPS (1-800-447-8477) or TTY 1-800-377-4950
	Fax: 1-800-223-8164
	Online: Forms.oig.hhs.gov/hotlineoperations
	Mail: U.S. Department of Health & Human Services Office of Inspector General Attn: OIG Hotline Operations P.O. Box 23489 Washington, DC 20026
	For Medicare Part C (Managed Care) or Part D (Prescription Drug Plans) complaints:
	• 1-877-7SafeRx (1-877-772-3379)

If You Are a…	Report Fraud to
Medicare Provider	 OIG Hotline: Phone: 1-800-HHS-TIPS (1-800-447-8477) or TTY 1-800-377-4950 Fax: 1-800-223-8164 Online: Forms.oig.hhs.gov/hotlineoperations Mail: U.S. Department of Health & Human Services Office of Inspector General Attn: OIG Hotline Operations P.O. Box 23489 Washington, DC 20026
	OR
	Your local MAC
Medicaid Beneficiary or Provider	 OIG Hotline Phone: 1-800-HHS-TIPS (1-800-447-8477) or TTY 1-800-377-4950 Fax: 1-800-223-8164 Online: Forms.oig.hhs.gov/hotlineoperations Mail: U.S. Department of Health & Human Services Office of Inspector General Attn: OIG Hotline Operations P.O. Box 23489 Washington, DC 20026
	 OR Your Medicaid State Agency: State MFCUs are listed in the <u>State By State Fraud and Abuse Reporting Contacts</u>

Table 3. Where Should You Report Fraud and Abuse? (cont.)

If you prefer to submit your complaint **anonymously** to the OIG Hotline, the OIG record systems will contain no information that could trace the complaint to you. However, lack of contact information may prevent OIG's comprehensive review of the complaint, so the OIG encourages you to provide contact information for possible follow-up.

Medicare and Medicaid beneficiaries can learn more about protecting themselves and spotting fraud by contacting their local Senior Medicare Patrol (SMP) program.

For questions about Medicare billing procedures, billing errors, or questionable billing practices, contact your MAC. For MAC contact information, including toll-free telephone numbers, visit the Review Contractor Directory – Interactive Map.

Resources

For more information about the OIG and fraud, visit the <u>OIG website</u>. For more information regarding preventing, detecting, and reporting fraud and abuse, as well as other Medicare information, refer to the resources listed below in Table 4. Table 5 includes the complete URL for all embedded hyperlinks in this booklet.

Resource	Website
HHS	http://www.hhs.gov
CMS	https://www.cms.gov
HEAT Task Force	https://www.stopmedicarefraud.gov/aboutfraud/ heattaskforce
OIG-Fraud	https://oig.hhs.gov/fraud
CMS Fraud and Abuse Products	https://www.cms.gov/Outreach-and-Education/Medicare- Learning-Network-MLN/MLNProducts/Downloads/Fraud- Abuse-Products.pdf
CMS Fraud Prevention Toolkit	https://www.cms.gov/Outreach-and-Education/Outreach/ Partnerships/FraudPreventionToolkit.html
Frequently Asked Questions: Medicare Fraud and Abuse	https://questions.cms.gov/faq.php?id=5005&rtopic=1887

Table 4. Fraud and Abuse Resources

Table 4. Fraud and Abuse Resources (cont.)

Resource	Website
"How CMS Is Fighting Fraud: Major Program	https://www.medscape.org/viewarticle/764791
Integrity Initiatives"	NOTE: To access this program, you need to create a free account.
Medicaid Program Integrity Education	https://www.cms.gov/medicare-medicaid-coordination/ fraud-prevention/medicaid-integrity-education/edmic- landing.html
Medicaid Program Integrity: Safeguarding Your Medical Identity Products	https://www.cms.gov/Outreach-and-Education/Medicare- Learning-Network-MLN/MLNProducts/Downloads/ SafeMed-ID-Products.pdf
"Medicare Learning Network® Electronic Mailing Lists: Keeping Health Care Professionals Informed" fact sheet	https://www.cms.gov/Outreach-and-Education/Medicare- Learning-Network-MLN/MLNProducts/MLN-Publications- Items/CMS1243324.html
MLN Guided Pathways: Provider Specific Medicare Resources	https://www.cms.gov/Outreach-and-Education/Medicare- Learning-Network-MLN/MLNEdWebGuide/Downloads/ Guided_Pathways_Provider_Specific_booklet.pdf
MLN Provider Compliance	https://www.cms.gov/Outreach-and-Education/Medicare- Learning-Network-MLN/MLNProducts/Provider Compliance.html
OIG Advisory Opinions	https://oig.hhs.gov/compliance/advisory-opinions
OIG Compliance 101	https://oig.hhs.gov/compliance/101
OIG Email Updates	https://oig.hhs.gov/contact-us

Table 4. Fraud and Abuse Resources (cont.)

Resource	Website
"Reducing Medicare and Medicaid Fraud and Abuse:	https://www.medscape.org/viewarticle/764496
Protecting Practices and Patients"	NOTE: To access this program, you need to create a free account.
The "Basics of Medicare" Web-Based Training (WBT) Series:	https://learner.mlnlms.com
Part One: History, program overview, enrollment	
Part Two: Billing, reimbursement, appeals	
Part Three: Claim review programs, fraud and abuse, outreach and education	

Table 5. Hyperlink Table

Embedded Hyperlink	Complete URL
CMS	https://www.cms.gov
CMS Blog	https://blog.cms.gov/category/cms-center-for- program-integrity
Code of Federal Regulations	https://www.gpo.gov/fdsys/pkg/CFR-2015-title42-vol2/pdf/ CFR-2015-title42-vol2-sec411-351.pdf
Comparison of the Anti-Kickback Statute and Stark Law	https://oig.hhs.gov/compliance/provider-compliance- training/files/StarkandAKSChartHandout508.pdf
List of Excluded Individuals/Entities	https://oig.hhs.gov/exclusions/exclusions_list.asp
Local MAC	https://www.cms.gov/Research-Statistics-Data-and- Systems/Monitoring-Programs/Medicare-FFS-Compliance- Programs/Review-Contractor-Directory-Interactive-Map
OIG Hotline Operations	https://www.youtube.com/watch?v=WIsnd1DYG6Y

Table 5. Hyperlink Table (cont.)

Embedded Hyperlink	Complete URL
OIG Website	https://oig.hhs.gov
Physician Self-Referral Law	https://www.cms.gov/Medicare/Fraud-and-Abuse/Physician SelfReferral
Public-Private Partnership to Prevent Health Care Fraud	https://www.stopmedicarefraud.gov/aboutfraud/ public-private
Regulatory Safe Harbors	https://oig.hhs.gov/compliance/safe-harbor-regulations
Reporting Fraud to the OIG	https://www.youtube.com/watch?v=nH7p30j7dOw
Review Contractor Directory – Interactive Map	https://www.cms.gov/Research-Statistics-Data-and- Systems/Monitoring-Programs/Medicare-FFS-Compliance- Programs/Review-Contractor-Directory-Interactive-Map
Senior Medicare Patrol	http://www.smpresource.org
State By State Fraud and Abuse Reporting Contacts	https://www.cms.gov/Medicare-Medicaid-Coordination/ Fraud-Prevention/FraudAbuseforConsumers/Downloads/ smafraudcontacts-oct2014.pdf
Stop Medicare Fraud	https://www.stopmedicarefraud.gov
Stop Medicare Fraud Newsroom	https://www.stopmedicarefraud.gov/newsroom
System for Award Management	https://www.sam.gov



This educational product was current at the time it was published or uploaded onto the web. Medicare policy changes frequently so links to the source documents have been provided within the document for your reference.

This educational product was prepared as a service to the public and is not intended to grant rights or impose obligations. This educational product may contain references or links to statutes, regulations, or other policy materials. The information provided is only intended to be a general summary. It is not intended to take the place of either the written law or regulations. We encourage readers to review the specific statutes, regulations, and other interpretive materials for a full and accurate statement of their contents.

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