



U.S. Department of Justice
Office of Information Policy
Sixth Floor
441 G Street, NW
Washington, DC 20530-0001

Telephone: (202) 514-3642

August 30, 2024

Neil Anand
1313 Cheltenham Drive
Bensalem, PA 19020
cardiacgasman@gmail.com

Re: FOIA-2022-00404
FOIA-2022-00877
23-cv-02527 (E.D. Pa.)
VRB:JMB:DRC

Dear Neil Anand:

This is a third interim response to your Freedom of Information Act (FOIA) requests received in this Office on November 22, 2021, and March 8, 2022, in which you requested various records concerning prosecutions of “pill mill” schemes and various records concerning *Ruan v. United States*, No. 20-1410 and the opioid crisis.

We previously provided you with two interim responses to your request, most recently on June 30, 2024. Please be advised that we have now completed the processing of an additional 132 pages containing records responsive to your request. At this time, I have determined that 127 pages containing records responsive to your request are appropriate for release with certain information withheld, including certain withholdings made on behalf of the Drug Enforcement Administration (DEA), Executive Office for United States Attorneys and the Federal Bureau of Investigation, pursuant to Exemptions 5, 6, 7(A), 7(C), 7(E), and 7(F) of the FOIA, 5 U.S.C. § 552(b)(5), (b)(6), (b)(7)(A), (b)(7)(C), (b)(7)(E), and (b)(7)(F), and copies are enclosed. Additionally, five pages are being withheld in full on behalf of the DEA pursuant to Exemption 5 of the FOIA. Exemption 5 pertains to certain inter- and intra-agency communications protected by civil discovery privileges. Exemption 6 pertains to information the release of which would constitute a clearly unwarranted invasion of personal privacy. Exemption 7(A) pertains to records or information compiled for law enforcement purposes, the release of which could reasonably be expected to interfere with enforcement proceedings. Exemption 7(C) pertains to records or information compiled for law enforcement purposes, the release of which could reasonably be expected to constitute an unwarranted invasion of personal privacy. Exemption 7(E) pertains to records or information compiled for law enforcement purposes, the release of which would disclose certain techniques and procedures or guidelines for law enforcement investigations or prosecutions. Exemption 7(F) pertains to records or information compiled for law enforcement purposes, the release of which could reasonably be expected to endanger the life or physical safety of an individual. Please be advised that we have considered the foreseeable harm standard when reviewing records and applying FOIA exemptions.

Finally, please note that the enclosed pages also contain non-responsive material, which has not been processed and is marked accordingly.

For your information, Congress excluded three discrete categories of law enforcement and national security records from the requirements of the FOIA. See 5 U.S.C. § 552(c) (2018). This response is limited to those records that are subject to the requirements of the FOIA. This is a standard notification that is given to all our requesters and should not be taken as an indication that excluded records do, or do not, exist.

If you have any questions regarding this response, please contact Fernando Rivera of the U.S. Attorney's Office for the Eastern District of Pennsylvania at (215) 861-8432.

Sincerely,



Jonathan Breyan
Senior Supervisory Attorney
for
Vanessa R. Brinkmann
Senior Counsel

Enclosures

From: "Solow, Sara (ODAG)" (b) (6)
To: "Axelrod, Matthew S. (ODAG)" (b) (6), "Thompson, Karl (ODAG)" (b) (6)
Cc: "Thiemann, Robyn (ODAG)" (b) (6)
Subject: X-Waiver "Guidelines"
Date: Thu, 11 Mar 2021 00:47:48 +0000
Importance: Normal
Attachments: HHS_Buprenorphine_Practice_Guidelines_dea_edits_030921.docx; 823(g) (2)_2d_paper7_(002).docx

Dear Matt and Karl,

(Karl, I emailed you about this same issue earlier, but you can ignore that email and just refer to this one). HHS is promulgating updated "practice guidelines" for DEA-registered physicians, which would enable them to prescribe buprenorphine to up to 30 patients at a time – *without* having to comply with the 8-hour training requirement. These proposed "practice guidelines" are attached (first doc), including some light line edits by DEA. (b) (5)

(b) (5)

I am hoping you can both find time with me (and Robyn if she is available) to discuss this tomorrow for 15 minutes.

(b) (5)

Any window tomorrow work, or early Friday A.M.? (ONDCP is pushing me for a response; I just received the below from DEA)

Yours
Sara

Sara A. Solow
Senior Counsel
Office of the Deputy Attorney General
U.S. Department of Justice
Cell: (b) (6)
Other: (b) (6)

From: (b)(6), (b)(7)(C), (b)(7)(F) per DEA@usdoj.gov>
Sent: Wednesday, March 10, 2021 5:57 PM
To: Solow, Sara (ODAG) (b) (6)
Subject: DEA Comments on Proposed X Waiver Guidelines

Hi Sara,

Attached, please find two documents from DEA. The first is a red-lined version from Diversion with some suggested edits. The second is from Chief Counsel (b) (5). We still need to send these through the A/A before they are final, but I wanted to get them to you as soon as possible (b) (5)

(b) (5)

Please let me know if you have questions or would like to discuss further with DEA.

Thanks so much!

(b)(6), (b)(7)(C), (b)(7)(F) per DEA

Chief of Staff

Drug Enforcement Administration

(b)(6), (b)(7)(C) per DEA

From: "ttp@mitre.org" <ttp@mitre.org>

To: "Lan, Iris (ODAG)" (b) (6)

Subject: HFPP Alerts for May 23, 2016

Date: Mon, 23 May 2016 17:15:17 -0000

Importance: Normal

This message has been archived.

View our online version here, <http://www.mmsend55.com/link.cfm?r=2490073842&sid=97049932&m=12929938&u=MITRE&j=33823263&s=https://contentsharing.net/actions/email_web_version.cfm?recipient_id=2490073842&message_id=12929938&user_id=MITRE&group_id=3234277&jobid=33823263> or the mobile version here <http://www.mmsend55.com/link.cfm?r=2490073842&sid=97049933&m=12929938&u=MITRE&j=33823263&s=https://contentsharing.net/actions/email_web_version.cfm?recipient_id=2490073842&message_id=12929938&user_id=MITRE&group_id=3234277&jobid=33823263>

banner002.jpg <<http://>>

Provider Alerts Posted

<http://hfpp-portal.org/> <<http://www.mmsend55.com/link.cfm?r=2490073842&sid=97049934&m=12929938&u=MITRE&j=33823263&s=http://hfpp-portal.org/>>

Two provider alerts have been posted to the Portal. The first involves a California pharmacy and compounding center engaged in a marketing scheme in which pharmacy representatives distributed fliers that misrepresented certain compounds, including scar gel and topical pain medications, as samples and not prescriptions. The pharmacy waived high copayments and told patients/providers that insurance paid the total cost.

In the second alert, another California pharmacy was altering patients' diagnoses in order to get prior authorizations for fentanyl-based prescriptions for cancer pain. Records indicated that most of the patients had chronic pain or were addicts but did not have cancer.

To view the alerts, follow these steps:

1. Navigate to <http://hfpp-portal.org/> <<http://www.mmsend55.com/link.cfm?r=2490073842&sid=97049935&m=12929938&u=MITRE&j=33823263&s=http://hfpp-portal.org/>> and log in.
2. Click on "Collaboration Space."
3. Use the left hand tool bar to select "HFPP Alerts."

Forgot your password? Send an email to ttp@mitre.org <<mailto:ttp@mitre.org>> .

Healthcare Fraud Prevention Partnership

ttp@csra.com <mailto:ttp@csra.com>

Click here <[http://www.mmsend55.com/link.cfm?
r=2490073842&sid=97049936&m=12929938&u=MITRE&j=33823263&s=http://unsubscribe.magnetma
il.net/Actions/unsubscribe.cfm?
message_id=12929938&user_id=MITRE&recipient_id=2490073842&group_id=3234277&jobid=338232
63](http://www.mmsend55.com/link.cfm?r=2490073842&sid=97049936&m=12929938&u=MITRE&j=33823263&s=http://unsubscribe.magnetmail.net/Actions/unsubscribe.cfm?message_id=12929938&user_id=MITRE&recipient_id=2490073842&group_id=3234277&jobid=33823263)> to unsubscribe.

poweredByDark.png <[http://www.mmsend55.com/link.cfm?
r=2490073842&sid=97049937&m=12929938&u=MITRE&j=33823263&s=http://www.realmagnet.com](http://www.mmsend55.com/link.cfm?r=2490073842&sid=97049937&m=12929938&u=MITRE&j=33823263&s=http://www.realmagnet.com)>

ttp@csra.com

1.888.652.1037

<http://www.mmsend55.com/spacer.cfm?tracking_id=30682684354&jid=33823263>

From: "ttp@mitre.org" <ttp@mitre.org>

To: "Lan, Iris (ODAG)" (b) (6)

Subject: HFPP Alerts for March 28, 2016

Date: Mon, 28 Mar 2016 19:01:32 -0000

Importance: Normal

This message has been archived.

View our online version here, <http://www.mmsend55.com/link.cfm?r=2490073842&sid=93231800&m=12495192&u=MITRE&j=32993529&s=https://contentsharing.net/actions/email_web_version.cfm?recipient_id=2490073842&message_id=12495192&user_id=MITRE&group_id=2976822&jobid=32993529> or the mobile version here <http://www.mmsend55.com/link.cfm?r=2490073842&sid=93231801&m=12495192&u=MITRE&j=32993529&s=https://contentsharing.net/actions/email_web_version.cfm?recipient_id=2490073842&message_id=12495192&user_id=MITRE&group_id=2976822&jobid=32993529>

banner002.jpg <<http://>>

Provider Alerts Posted

<http://hfpp-portal.org/> <<http://www.mmsend55.com/link.cfm?r=2490073842&sid=93231802&m=12495192&u=MITRE&j=32993529&s=http://hfpp-portal.org/>>

Two new provider alerts have been posted to the HFPP portal. The first involves an orthopedic supply company suspected of up-coding an electric heating pad (E0215) as a Water Circulating Unit with Pump (E0217). In addition, the company is suspected of unbundling by separately charging for the water circulating systems and water circulating pads. Another TIN was also billing this identical pattern. The second alert focuses on a laboratory billing for drug screenings of members who have not seen and do not live close to the referring providers.

To view the alerts, follow these steps:

1. Navigate to <http://hfpp-portal.org/> <<http://www.mmsend55.com/link.cfm?r=2490073842&sid=93231803&m=12495192&u=MITRE&j=32993529&s=http://hfpp-portal.org/>> and log in.
2. Click on "Collaboration Space."
3. Use the left hand tool bar to select "HFPP Alerts."

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ttp@csra.com <mailto:ttp@csra.com>

Click here <[http://www.mmsend55.com/link.cfm?
r=2490073842&sid=93231804&m=12495192&u=MITRE&j=32993529&s=http://unsubscribe.magnetma
il.net/Actions/unsubscribe.cfm?
message_id=12495192&user_id=MITRE&recipient_id=2490073842&email=\(b\) \(6\) &group_i
d=2976822](http://www.mmsend55.com/link.cfm?r=2490073842&sid=93231804&m=12495192&u=MITRE&j=32993529&s=http://unsubscribe.magnetmail.net/Actions/unsubscribe.cfm?message_id=12495192&user_id=MITRE&recipient_id=2490073842&email=(b) (6) &group_id=2976822)> to unsubscribe.

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r=2490073842&sid=93231805&m=12495192&u=MITRE&j=32993529&s=http://www.realmagnet.com](http://www.mmsend55.com/link.cfm?r=2490073842&sid=93231805&m=12495192&u=MITRE&j=32993529&s=http://www.realmagnet.com)>

ttp@csra.com

1.888.652.1037

<http://www.mmsend55.com/spacer.cfm?tracking_id=29914578730&jid=32993529>

From: "HFPP Trusted Third Party" <ttp@csra.com>

To: "Lan, Iris (ODAG)" (b) (6)

Subject: HFPP Provider Alerts - July 11, 2016

Date: Mon, 11 Jul 2016 18:00:38 -0000

Importance: Normal

This message has been archived.

Healthcare Fraud Prevention Partnership <<http://info.hms.com/rs/609-NMZ-514/images/HFPPBasicEmailHeader.gif>>

Provider Alerts Posted

<http://hfpp-portal.org/> <<http://gomarketing.hms.com/TgyNE0301000tMB20S6QyZ0>>

Two provider alerts have been posted to the Portal.

The first alert indicates a possible Stark Law violation. Data identified a physician with a concerning pattern of opioid distribution. Research found the physician did not disclose his ownership in the pharmacy where many of the prescriptions are being filled.

In the second alert, a pharmacy was identified as being involved with bulk compound creation, and is actually running two distinct pharmacy entities under a single pharmacy credentialing packet.

To view the alerts, follow these steps:

1. Navigate to <http://hfpp-portal.org/> <<http://gomarketing.hms.com/TgyNE0301000tMB20S6QyZ0>> and log in.
2. Click on "Collaboration Space."
3. Use the left hand tool bar to select "HFPP Alerts."

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To unsubscribe from all HFPP communications, click here <<http://gomarketing.hms.com/b0000yMSEND0Z31i020Qt6y>> .

<<http://gomarketing.hms.com/trk?>

t=1&mid=NjA5LU5NWiw0MTQ6MjEyND0NTk4OjE1OTM5OjA6Mjk0MDo3OjE2MzE2NTc6aXJpcy5sYW4zQH
VzZG9qLmdvdg%3D%3D>

From: "HFPP Trusted Third Party" <ttp@csra.com>

To: "Lan, Iris (ODAG)" (b) (6)

Subject: HFPP Provider Alerts - 9/6

Date: Tue, 06 Sep 2016 18:00:23 -0000

Importance: Normal

This message has been archived.

Healthcare Fraud Prevention Partnership <<http://info.hms.com/rs/609-NMZ-514/images/HFPPBasicEmailHeader.gif>>

Provider Alerts Posted

<http://hfpp-portal.org/> <<http://gomarketing.hms.com/kN0oS0y00R302MyQt10w60Z>>

Three provider alerts are now posted to the HFPP Portal.

The first alert involves disputes for services not rendered. An investigation disclosed that the provider, a periodontist, billed for services not rendered under Current Dental Terminology (CDT) D0180 (Comprehensive periodontal evaluation - new or established patient) and 4000 series periodontal codes. Referrals have been sent to the OIG, DOI, and Florida Department of Health Medical Quality Assurance department.

The second alert involves prescription fraud. A review of records identified medication shortages where no purchasing records were identified. Additionally, discrepancies included invalid signatures, incorrect origin codes, prescriber IDs, and written dates.

The third alert involves prescription fraud. A review of records identified discrepancies in purchasing records. The discrepancies included missing prescriptions, signature logs, and exceeding authorized refills. When requested, the wholesaler was unable to verify supporting documents.

To view the alerts, follow these steps:

1. Navigate to <http://hfpp-portal.org/> <<http://gomarketing.hms.com/kN0oS0y00R302MyQt10w60Z>> and log in.
2. Click on "Collaboration Space."
3. Use the left hand tool bar to select "HFPP Alerts."

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From: "ttp@mitre.org" <ttp@mitre.org>

To: "Lan, Iris (ODAG)" (b) (6)

Subject: HFPP Alerts for May 16, 2016

Date: Mon, 16 May 2016 18:05:51 -0000

Importance: Normal

This message has been archived.

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Provider Alerts Posted

<http://hfpp-portal.org/> <<http://www.mmsend55.com/link.cfm?r=2490073842&sid=96634152&m=12882003&u=MITRE&j=33719652&s=http://hfpp-portal.org/>>

Two new provider alerts have been posted to the HFPP Portal. In the first provider alert, a California acupuncture clinic and individual acupuncturist are improperly billing EM code 99213 with every clinic visit and attaching modifier 25 to each visit.

The other provider alert involves a California clinic that billed evaluation codes on a patient for every day of each month, even though the patient visited the clinic at the most only four days during any given month. The provider often billed these evaluation codes without supplies or drugs. million.

To view the alerts, follow these steps:

1. Navigate to <http://hfpp-portal.org/> <<http://www.mmsend55.com/link.cfm?r=2490073842&sid=96634153&m=12882003&u=MITRE&j=33719652&s=http://hfpp-portal.org/>> and log in.
2. Click on "Collaboration Space."
3. Use the left hand tool bar to select "HFPP Alerts."

Forgot your password? Send an email to ttp@mitre.org <<mailto:ttp@mitre.org>> .

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r=2490073842&sid=96634154&m=12882003&u=MITRE&j=33719652&s=http://unsubscribe.magnetma
il.net/Actions/unsubscribe.cfm?
message_id=12882003&user_id=MITRE&recipient_id=2490073842&group_id=3203427&jobid=337196
52](http://www.mmsend55.com/link.cfm?r=2490073842&sid=96634154&m=12882003&u=MITRE&j=33719652&s=http://unsubscribe.magnetmail.net/Actions/unsubscribe.cfm?message_id=12882003&user_id=MITRE&recipient_id=2490073842&group_id=3203427&jobid=33719652)> to unsubscribe.

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r=2490073842&sid=96634155&m=12882003&u=MITRE&j=33719652&s=http://www.realmagnet.com](http://www.mmsend55.com/link.cfm?r=2490073842&sid=96634155&m=12882003&u=MITRE&j=33719652&s=http://www.realmagnet.com)>

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<http://www.mmsend55.com/spacer.cfm?tracking_id=30581388598&jid=33719652>

From: "ttp@mitre.org" <ttp@mitre.org>

To: "Lan, Iris (ODAG)" (b) (6)

Subject: HFPP Provider & Scheme Alerts

Date: Mon, 08 Feb 2016 20:06:21 -0000

Importance: Normal

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Provider Alerts Posted

<http://hfpp-portal.org/> <<http://www.mmsend55.com/link.cfm?r=2490073842&sid=89825618&m=12089475&u=MITRE&j=32266911&s=http://hfpp-portal.org/>>

New Provider Alerts have been posted on the HFPP portal. The first is a provider alert on an upcoding scheme that encourages all affiliated providers to use Risk Adjustment Factors (RAF) diagnoses to maximize Medicare reimbursement. The second is a scheme alert involving ghost enrollment in Federal Health Care Exchanges with corresponding fraudulent billing.

To access the alerts log in to: <http://hfpp-portal.org/> <<http://www.mmsend55.com/link.cfm?r=2490073842&sid=89825618&m=12089475&u=MITRE&j=32266911&s=http://hfpp-portal.org/>> , and from the Collaboration Space use the left hand tool bar to select HFPP Alerts. Forgot your password? Please contact ttp@mitre.org <<mailto:ttp@mitre.org>> .

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ttp@csra.com <mailto:ttp@csra.com>

Click here <[http://www.mmsend55.com/link.cfm?
r=2490073842&sid=89825619&m=12089475&u=MITRE&j=32266911&s=http://unsubscribe.magnetma
il.net/Actions/unsubscribe.cfm?
message_id=12089475&user_id=MITRE&recipient_id=2490073842&email=\(b\) \(6\) &group_i
d=2772495](http://www.mmsend55.com/link.cfm?r=2490073842&sid=89825619&m=12089475&u=MITRE&j=32266911&s=http://unsubscribe.magnetmail.net/Actions/unsubscribe.cfm?message_id=12089475&user_id=MITRE&recipient_id=2490073842&email=(b) (6) &group_id=2772495)> to unsubscribe.

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r=2490073842&sid=89825620&m=12089475&u=MITRE&j=32266911&s=http://www.realmagnet.com](http://www.mmsend55.com/link.cfm?r=2490073842&sid=89825620&m=12089475&u=MITRE&j=32266911&s=http://www.realmagnet.com)>

2275 Rolling Run Drive, Windsor Mill, MD 21224

<http://www.mmsend55.com/spacer.cfm?tracking_id=29243048052&jid=32266911>

From: "HFPP Trusted Third Party" <ttp@csra.com>

To: "Lan, Iris (ODAG)" (b) (6)

Subject: HFPP Provider Alerts - July 25, 2016

Date: Mon, 25 Jul 2016 18:00:21 -0000

Importance: Normal

This message has been archived.

Healthcare Fraud Prevention Partnership <<http://info.hms.com/rs/609-NMZ-514/images/HFPPBasicEmailHeader.gif>>

Provider Alerts Posted

<http://hfpp-portal.org/> <<http://gomarketing.hms.com/ey0tXZ02000MNJ0Q61HS30y>>

Three provider alerts are now posted to the HFPP Portal.

The first alert involves the analysis of a school therapist counselor who billed for services and supplies not rendered. Recipients stated that no services were provided during school hours and the provider pled guilty to fraud.

The second alert involves services being rendered by unlicensed individuals. During interviews with recipients, the unlicensed individuals were identified as staff nurses.

The third alert involves unbundling of services regarding pneumatic compression devices with Healthcare Procedure Coding System (HCPCS) codes E0650 through E0676 that are inclusive with the facility charges.

To view the alerts, follow these steps:

1. Navigate to <http://hfpp-portal.org/> <<http://gomarketing.hms.com/ey0tXZ02000MNJ0Q61HS30y>> and log in.
2. Click on "Collaboration Space."
3. Use the left hand tool bar to select "HFPP Alerts."

Forgot your password? Send an email to ttp@mitre.org <<http://gomarketing.hms.com/DNY600I0ZMt00J01Sy230yQ>> .

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<<http://gomarketing.hms.com/CM300J0ZS0JN0yyt2Q01Z06>> .

<<http://gomarketing.hms.com/trk?t=1&mid=NjA5LU5NWj01MTQ6MjIwMjo0NzA2OjE2MTUxOjA6Mjk4Nzo3OjE2MzE2NTc6aXJpcy5sYW4zQHVzZG9qLmdvdg%3D%3D>>

From: "HFPP Trusted Third Party" <ttp@csra.com>

To: "Lan, Iris (ODAG)" (b) (6)

Subject: HFPP Provider Alerts - August 29, 2016

Date: Mon, 29 Aug 2016 18:32:13 -0000

Importance: Normal

This message has been archived.

Healthcare Fraud Prevention Partnership <<http://info.hms.com/rs/609-NMZ-514/images/HFPPBasicEmailHeader.gif>>

Provider Alerts Posted

<http://hfpp-portal.org/> <<http://gomarketing.hms.com/v06t0yQe0ySZN351M02Q000>>

Two provider alerts are now posted to the HFPP Portal.

The first alert involves non-covered services where a company is marketing a device as meeting the specifications for CPT 88361; however the device is experimental and investigational. The device is being presented to gastroenterologists as an alternative to approved methods of upper GI endoscopic forceps biopsy. Kickbacks are paid to the physicians for using the device. Exposure was over \$3 million for this provider, including Medicare payments when detected. Other providers were found to be billing same/similar services and cases were also opened. Clinical policies were updated and system edits were implemented to deny services billed.

The second alert involves misrepresentations of medical records where companies are billing for services performed by other entities. The provider is a billing company and not the actual servicing provider.

To view the alerts, follow these steps:

1. Navigate to <http://hfpp-portal.org/> <<http://gomarketing.hms.com/v06t0yQe0ySZN351M02Q000>> and log in.
2. Click on "Collaboration Space."
3. Use the left hand tool bar to select "HFPP Alerts."

Forgot your password? Send an email to ttp@mitre.org <<http://gomarketing.hms.com/r60f0Z2Q0M6StyN1300Q0y0>> .

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To unsubscribe from all HFPP communications, click here
<<http://gomarketing.hms.com/UQ7306Z0SM0NyQ021y000gt>> .

<<http://gomarketing.hms.com/trk?t=1&mid=NjA5LU5NWjI5MTQ6MjI5MDo1MDExOjE4OTg2OjA6MzA1NT03OjE2MzE2NTc6aXJpcy5sYW4zQH VzZG9qLmdvdg%3D%3D>>

From: "HFPP Trusted Third Party" <ttp@csra.com>

To: "Lan, Iris (ODAG)" (b) (6)

Subject: HFPP Provider Alerts - July 17, 2016

Date: Mon, 18 Jul 2016 18:00:25 -0000

Importance: Normal

This message has been archived.

Healthcare Fraud Prevention Partnership <<http://info.hms.com/rs/609-NMZ-514/images/HFPPBasicEmailHeader.gif>>

Provider Alerts Posted

<http://hfpp-portal.org/> <<http://gomarketing.hms.com/P000y0yNSM03p60G0t6Z1Q2>>

Two provider alerts are now posted to the HFPP Portal.

(b)(7)(E) per FBI

The second alert involves services that were billed by hospitals that did not perform the services, but were completed by other entities. Billings are submitted through the hospital at inflated rates to illegally increase their revenue.

To view the alerts, follow these steps:

1. Navigate to <http://hfpp-portal.org/> <<http://gomarketing.hms.com/P000y0yNSM03p60G0t6Z1Q2>> and log in.
2. Click on "Collaboration Space."
3. Use the left hand tool bar to select "HFPP Alerts."

Forgot your password? Send an email to ttp@csra.com <<http://gomarketing.hms.com/WN017yM6S0q2Zy300Q0tG00>> .

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To unsubscribe from all HFPP communications, click here
<<http://gomarketing.hms.com/WN018yM6S0r2Zy300Q0tG00>> .

<<http://gomarketing.hms.com/trk?t=1&mid=NjA5LU5NWjE0MTQ6MjE0MDo0NjM4OjE2MDI0OjA6Mjk4Njo3OjE2MzE2NTc6aXJpcy5sYW4zQH VzZG9qLmdvdg%3D%3D>>

From: Trusted Third Party for HFPP <ttp@csra.com>

To: Trusted Third Party for HFPP <ttp@csra.com>

Subject: HFPP Provider Alert: March 20, 2017

Date: Mon, 20 Mar 2017 15:54:35 +0000

Importance: Normal

Inline-Images: image001.jpg



Provider Alert Posted

The Centers for Medicare & Medicaid Services (CMS) has been made aware of information involving a pharmacist and owner of two pharmacies billing Medicare for higher reimbursed drugs for compounding but using lower reimbursed drugs (bulk powder) to make the compound product. The owner and pharmacist, (b) (6) was arrested and charged on February 16, 2017. He allegedly billed for Lidocaine ointment and Ketoprofen tablets to make the compound, while actually using bulk powder form.

We are alerting you to this information so that you can take appropriate measures regarding these pharmacies and the Medicare Part C and Part D benefits you offer. These measures, in particular, should be focused on the appropriate detection and identification of fraud, waste, and abuse as required under Medicare Part C and Part D. Additional information, such as the pharmacy names, practice location, and National Provider Identification (NPI) numbers can be found below.

Pharmacy	Address	NPI
(b) (6)	(b) (6)	(b) (6)
(b) (6)	(b) (6)	(b) (6)

If you identify egregious billings from these pharmacies, please contact Health Integrity, CMS' National Benefit Integrity Medicare Drug Integrity Contractor (NBI MEDIC) or CMS. Any questions you may have on this subject should be directed to your CMS Account Manager or (b) (6) of the National Benefit Integrity MEDIC at (b) (6). The NBI MEDIC may also be reached at 1-877-TSAFERX (1-877-772-3379).

To learn more, access the [HFPP Portal](#) and follow the instructions below:

1. Click "Partner to Partner Sharing" from the left-hand menu
2. Click "Provider Alerts"
3. Click on ID numbers "[37645](#)", "[37886](#)"

Do you have an alert to share with the Partnership? Send an email to ttp@csra.com.

This electronic message transmission contains information from CSRA that may be attorney-client privileged, proprietary or confidential. The information in this message is intended only for use by the individual(s) to whom it is addressed. If you believe you have received this message in error, please contact me immediately and be aware that any use, disclosure, copying or distribution of the contents of this message is strictly prohibited. NOTE: Regardless of content, this email shall not operate to bind CSRA to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of email for such purpose.

From: Trusted Third Party for HFPP <ttp@csra.com>

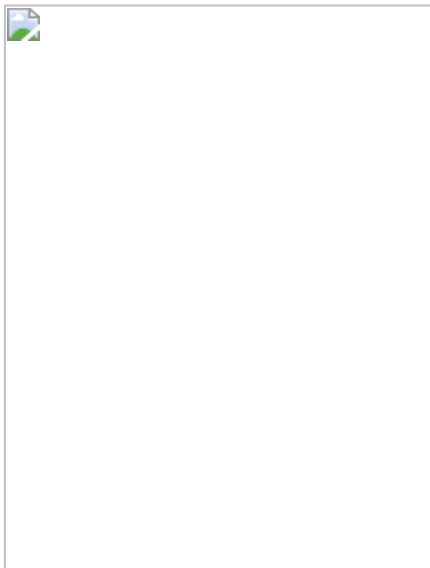
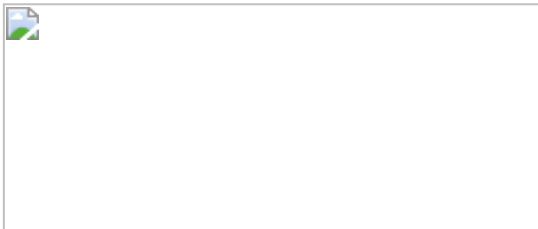
To: (b) (6) (b) (6)

Subject: NEW HFPP Provider/Fraud Alerts Posted to the Portal

Date: Wed, 24 Jan 2018 13:59:29 -0500

Importance: Normal

Having trouble viewing this mail? [Click here to view it in your browser.](#)
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January 24, 2018

*Quickly access the portal
by clicking the icon below:*

Dear HFPP Members,

On January 19th, the Healthcare Fraud Prevention Partnership (HFPP) held a successful Regional Information Sharing Session at Kaiser Permanente in Pasadena California. During this session, 49 participants from across 15 federal, state, public, and private organizations networked and shared information on recent investigative activities, cases, and fraud schemes. Attendees discussed a wide range of cases and areas of focus. Partners approved the posting of 5 Provider Alerts and 2 Fraud Scheme Notifications to the [HFPP Portal](#).

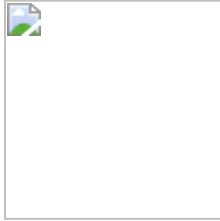
To learn more, follow the instructions below:

1. To access the **Provider Alerts**, click on the following ID numbers: [70351](#), [70355](#), [70356](#), [70358](#), [70359](#)
2. To access the **Fraud Scheme/Code Alerts**, click on the following ID numbers: [70353](#), [70354](#)

Thank you to all the attendees and to Kaiser Permanente for hosting a successful event! Your dedication and engagement enable us to join forces to combat and prevent healthcare fraud, waste, and abuse across the healthcare spectrum.

Please continue to watch your inbox

and the HFPP Portal for information and registration details about upcoming HFPP events.



**Is your organization interested in hosting an HFPP event?
Do you have an alert to share with the Partnership?**
If so, send an email to the Trusted Third Party at ttp@csra.com.

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This message was sent by CSRA.
CSRA | 3170 Fairview Park Drive | Falls Church, VA 22042

From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6)

Subject: HFPP Summary Report Announcement for Studies 17.2 and 17.11

Date: Thu, 20 Sep 2018 08:58:12 -0400

Importance: Normal

Having trouble viewing this mail? [Click here to view it in your browser.](#)
Make sure that you always get our messages: Add ttp@csra.com to your contacts.



Dear HFPP Members,

The Trusted Third Party (TTP) is pleased to inform you that the Summary Reports for studies 17.2 Deactivated Providers (5th iteration, identified as 17.2D), and 17.11 Deactivated Referring Providers (3rd iteration, identified as 17.11B), have been uploaded to the HFPP Portal for review. Both studies were closed, effective 9/10/2018 and 9/20/2018, respectively.

- Study 17.2D analyzed rendering providers deactivated prior to date of service.
- Study 17.11B analyzed referring providers deactivated at least 12 months prior to the date of service.

To download these reports:

1. Log onto the [HFPP Portal](#)
2. From the left hand navigation menu select **Studies**
3. Click ID 47168 to access Study 17.2 (the report will identify the iteration)
4. Click ID 66052 to access Study 17.11 (the report will identify the iteration)
5. Under Quick Links, click **View Summary Results**

These studies have been reopened as recurring studies. On a quarterly basis, the TTP will publish the list of NPIs meeting each study's criteria for participating Partners.

If your organization would like to participate in HFPP studies and does not have a signed Data Sharing Agreement (DSA), please contact Alex Olson at

(b) (6)

Sincerely,

The Trusted Third Party

We welcome your comments and feedback on the results of these studies. Please send an email to the TTP at ttp@csra.com, or to the Studies Manager, Tim Carrico, at (b) (6).

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This message was sent by GDIT.
GDIT | 3170 Fairview Park Drive | Falls Church, VA 22042

From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6)

Subject: HFPP Provider Alerts: Thursday April 19, 2018

Date: Thu, 19 Apr 2018 09:28:20 -0400

Importance: Normal

Having trouble viewing this mail? [Click here to view it in your browser.](#)
Make sure that you always get our messages: Add ttp@csra.com to your contacts.



Dear HFPP Member,

Two new provider alerts have been posted to the HFPP Portal:

April 19, 2018

*Quickly access the portal
by clicking the icon below:*



1. An investigation identified potential fraud related to inappropriate billing and prescribing of medication. Four pharmacies appear to have submitted multiple claims for diabetic supplies and high-cost topical drugs; many prescribed by the same physician. The pharmacies involved have the same owner and further research revealed that the pharmacy owner and prescriber live together. A referral has been made to law enforcement.

Access this alert by clicking the Alert ID # below:



2. An investigation identified

potential fraud related to inappropriate billing. The provider was routinely submitting claims with service dates after the beneficiaries death. The investigation is ongoing.

Access this alert by clicking the Alert ID # below:



Do you have an alert to share with other HFPP Members?
You can post them directly to the [HFPP Portal](#) or send them to the Trusted Third Party at ttp@csra.com.

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From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6)

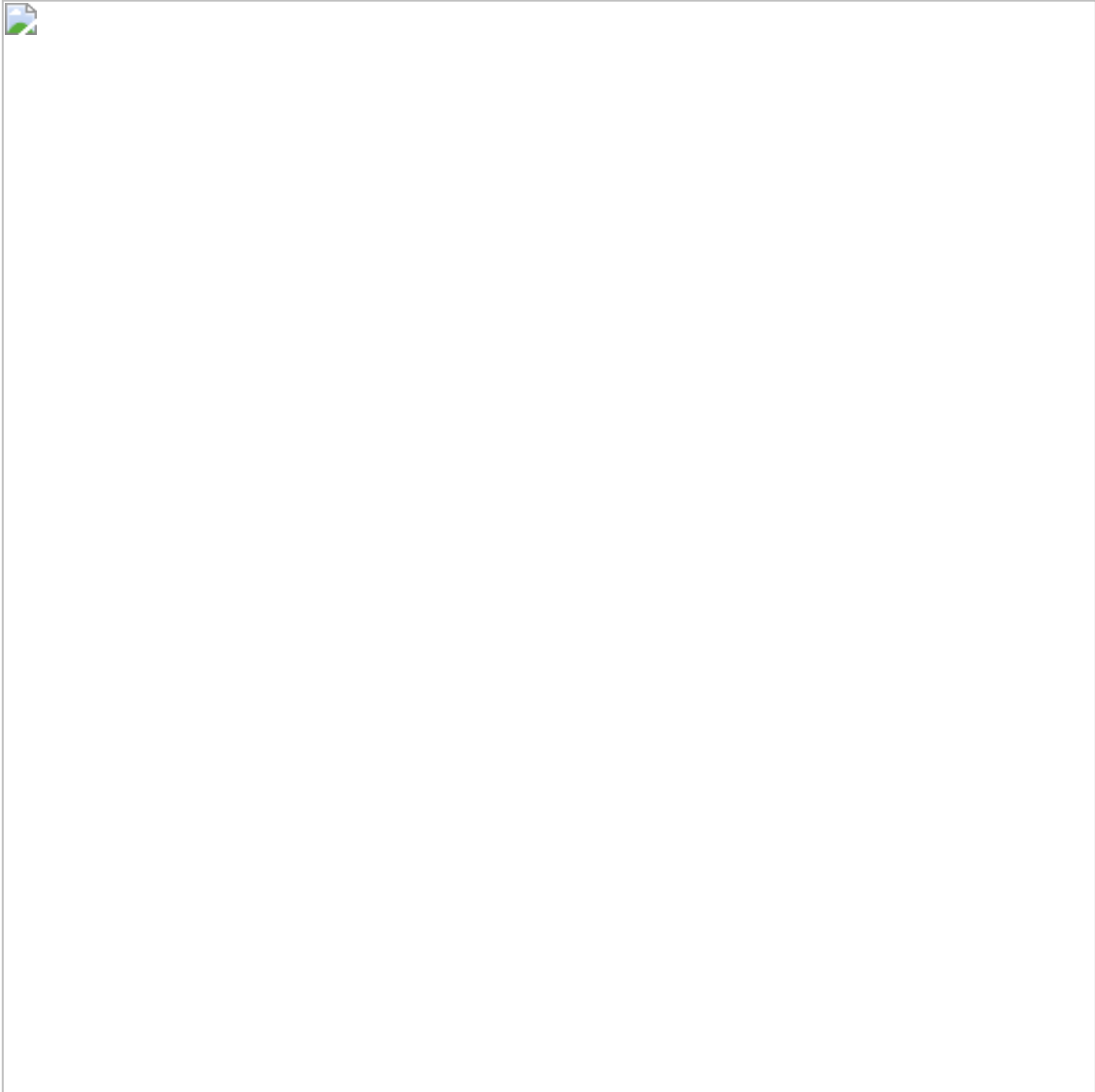
Subject: Additional Post-RISS Alerts Posted to HFPP Portal!

Date: Tue, 12 Feb 2019 18:59:28 +0000

Importance: Normal

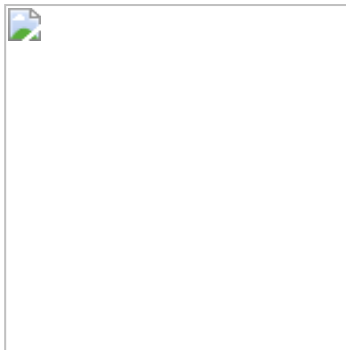


Additional Alerts Posted to the HFPP Portal

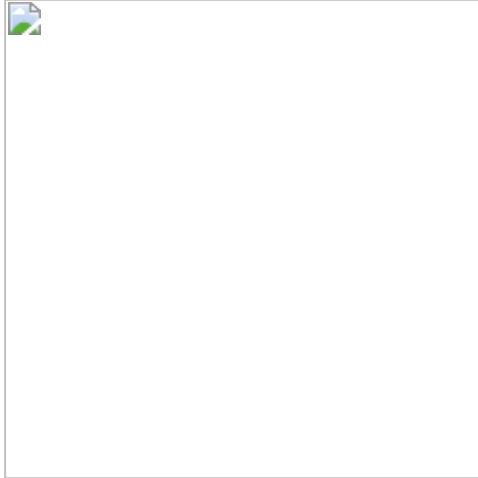


Dear HFPP Members,

Additional alert notifications were approved for posting to the HFPP Portal from the January 17th joint Regional Information Sharing Session with the National Health Care Anti-Fraud Association (NHCAA). View the post-event alerts below:



[118287](#), [118290](#)



[118293](#)

Want to change how you receive these emails?
You can [update your preferences](#) or [unsubscribe from this list](#).

From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6)

Subject: HFPP Provider Alert: November 30, 2017 - DMEPOS Upcoding

Date: Thu, 30 Nov 2017 13:57:58 -0500

Importance: Normal

Having trouble viewing this mail? [Click here to view it in your browser.](#)
Make sure that you always get our messages: Add ttp@csra.com to your contacts.



Dear HFPP Member,

An investigation identified fraud related to inappropriate billing for Durable Medical Equipment, Prosthetics, and Supplies (DMEPOS). A provider billed members for higher reimbursed or never received prosthetics and charged members excessive co-pay amounts. The investigation is complete and the provider was terminated.

DMEPOS Upcoding

November 30, 2017

*Quickly access the Portal
by clicking the icon below:*



Access this alert by clicking the
Alert ID # below:



Do you have an alert to share with other HFPP Members?
You can post them directly to the HFPP Portal or send them to the
Trusted Third Party at ttp@csra.com.

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This email is being sent to (b) (6)

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CSRA | 3170 Fairview Park Drive | Falls Church, VA 22042

From: Trusted Third Party <ttp@gdit.com>

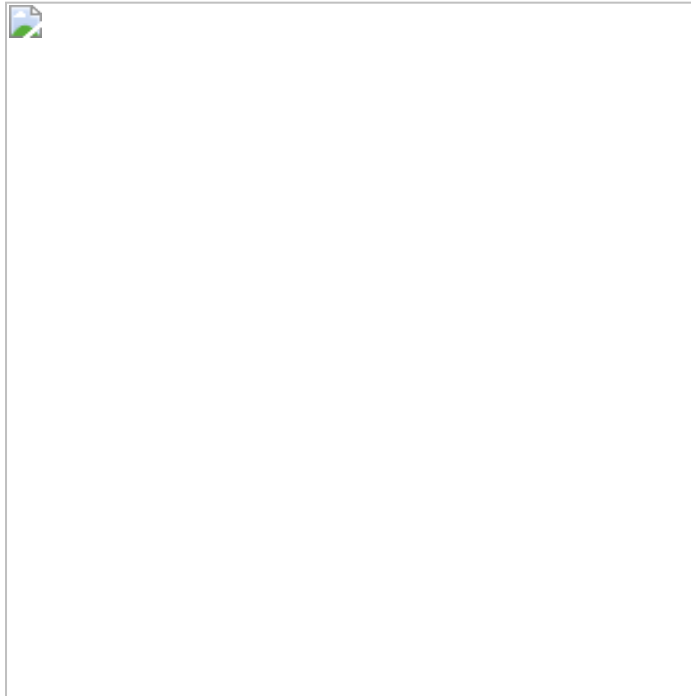
To: (b) (6)

Subject: Provider Alert Posted: June 5, 2019

Date: Wed, 5 Jun 2019 15:59:24 +0000

Importance: Normal





New Alert Posted June 5, 2019:

Dear HFPP Member,

An internal referral noted potential billing discrepancies for an externally contracted internist service provider. The medical documentation reviewed was either insufficient, outside the scope of the contract, or did not support the services billed. The billing deficiencies were conveyed as an overpayment demand to the provider. The settlement/mitigation is pending.

Access this alert by clicking the Alert ID # below:

Alert ID: 141309

Do you have an alert to share with other HFPP Members?

You can post them directly to the [HFPP Portal](#) or send them to the Trusted Third Party at ttp@gdit.com.

Want to change how you receive these emails?
You can [update your preferences](#) or [unsubscribe from this list](#).

From: Trusted Third Party for HFPP <ttp@csra.com>

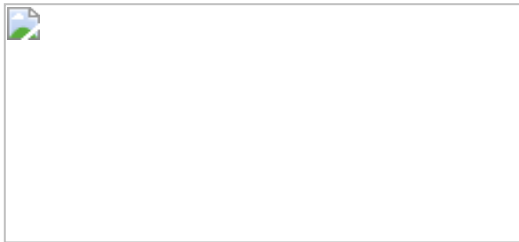
To: (b) (6)

Subject: HFPP Provider Alert: September 6, 2018

Date: Thu, 6 Sep 2018 08:59:01 -0400

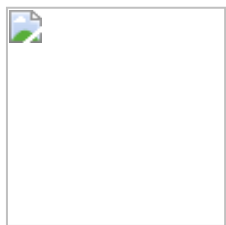
Importance: Normal

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September 6, 2018

*Quickly access the portal
by clicking the icon below:*



Dear HFPP Member,

An investigation identified inappropriate billing for durable medical equipment (DME).

Multiple providers were suspected of billing the same member for unrequested braces that were never received. While not yet confirmed, the investigation suggests information sharing and/or collusion. The providers were referred to the Medicare Drug Integrity Contractor (MEDIC) and system edits have been put in place.

Access this alert by clicking the Alert ID # below:

 [92966.png](#)

Do you have an alert to share with other HFPP Members?
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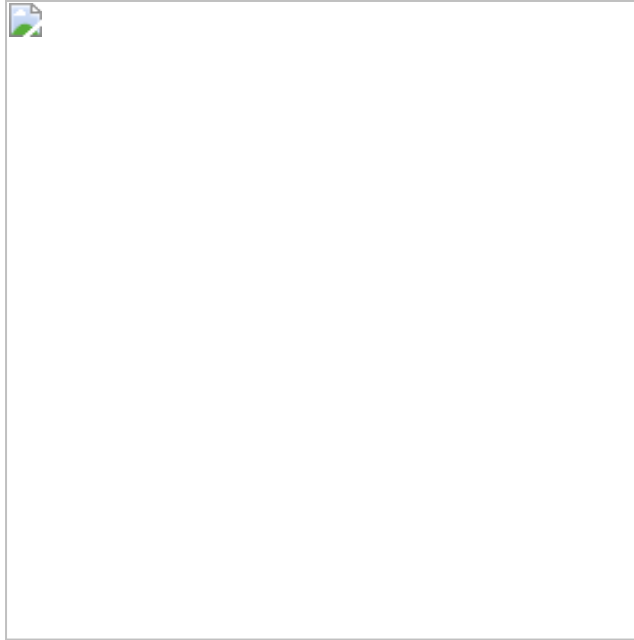
From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6)

Subject: Provider Alerts Posted: January 16, 2019

Date: Wed, 16 Jan 2019 15:17:07 +0000

Importance: Normal



New Alerts Posted January 16, 2019:

Dear HFPP Member,

An investigation identified inappropriate prescribing of medication including fentanyl patches, morphine, hydrocodone, oxycodone, and hydromorphone. Further analysis revealed that the providers are outlier prescribers for high doses of opioid prescriptions.

To access these alerts, click the following ID numbers:

112146

112148

Do you have an alert to share with other HFPP Members?

If so, you can post them directly to the [HFPP Portal](#) or send them to the Trusted Third Party at ttp@csra.com.

Want to change how you receive these emails?
You can [update your preferences](#) or [unsubscribe from this list](#).

From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6)

Subject: HFPP Provider Alerts: February 6, 2018

Date: Tue, 6 Feb 2018 13:58:35 -0500

Importance: Normal

Having trouble viewing this mail? [Click here to view it in your browser.](#)
Make sure that you always get our messages: Add ttp@csra.com to your contacts.



Dear HFPP Member,

Three new provider alerts have been posted to the HFPP Portal:

February 6, 2018

*Quickly access the portal
by clicking the icon below:*



1. An investigation identified potential fraud related to both inappropriate billing for medication and identity fraud. A beneficiary's Protected Health Information (PHI) was used by an out-of-network pharmacy to gain approval for unnecessary prescriptions sent via fax to a physician. The investigation is ongoing.

Access this alert by clicking the Alert ID # below:



2. Two possible instances of fraud related to inappropriate prescribing of medication were identified. The first alert involves a physician; the second alert involves a nurse

practitioner working under his supervision. Both appear to be prescribing high amounts of controlled substances that exceed current dosage guidelines, placing patients at risk. Further analysis revealed that the physician was on medical probation for five years related to alcohol abuse. The provider's contracts were terminated.

Access these alerts by clicking the Alert ID # below:



Do you have an alert to share with other HFPP Members?
You can post them directly to the [HFPP Portal](#) or send them to the Trusted Third Party at ttp@csra.com.

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This email is being sent to (b) (6).

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From: Trusted Third Party <ttp@gdit.com>

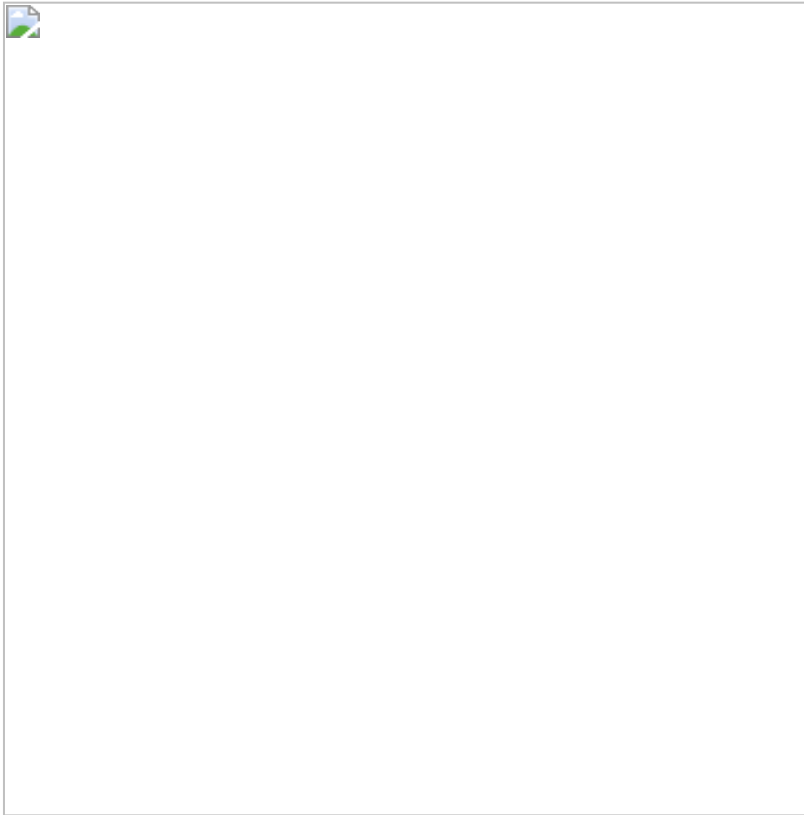
To: (b) (6)

Subject: Provider Alerts Posted: June 26, 2019

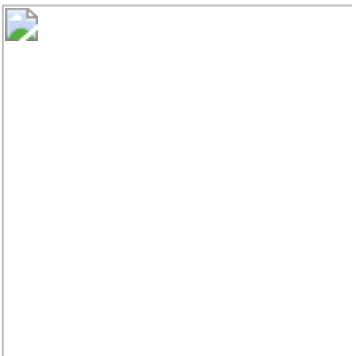
Date: Wed, 26 Jun 2019 14:59:30 +0000

Importance: Normal





New Alerts Posted: June 26, 2019



Dear HFPP Member,

Investigations identified pharmacies submitting excessive test claims when compared to approved claims for expensive topical medications and/or diabetic supplies. Further analysis revealed that the pharmacies failed desk audits with a discrepancy rate of 100%. The investigation is ongoing.

Access the alerts by clicking the Alert ID #s below:

Alert ID: 143398

Alert ID: 144033

Do you have an alert to share with other HFPP Members?

You can post them directly to the [HFPP Portal](#) or
send them to the Trusted Third Party at ttp@gdit.com.

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From: Trusted Third Party <ttp@gdit.com>

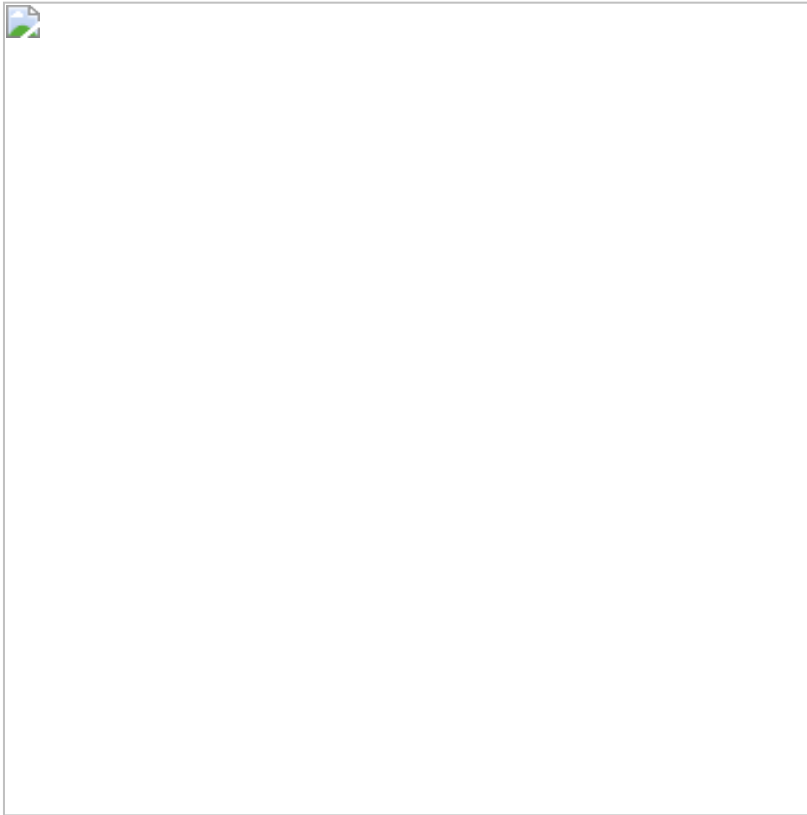
To: (b) (6)

Subject: Provider Alerts Posted: August 28, 2019

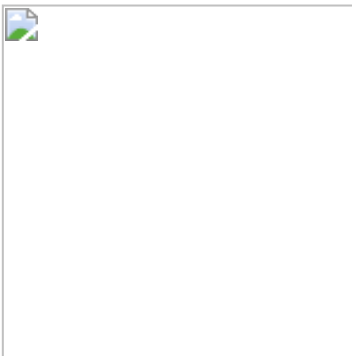
Date: Wed, 28 Aug 2019 14:59:39 +0000

Importance: Normal





New Alerts Posted: August 28, 2019



Partners have posted three new Pharmacy fraud alerts to the HFPP Portal:

The first two alerts are based on investigations that stem from information obtained from the *CMS February 2019 Quarterly Drug Trend Analysis Memo*. The memo identified Providers as inappropriately prescribing opioids. Further analysis revealed that the Providers are outliers for high opioid prescribing.

Which can place patients at an increased risk of overdose.

Access the alerts by clicking the Alert ID #s below:

Alert ID: 156129

Alert ID: 156458

The third alert is based on a proactive review of the CMS Predictive Learning Analytics Tracking Outcomes (PLATO) tool, that identified a Provider as an outlier for paid Serostim pharmacy claims. Serostim is used to treat HIV patients and has been identified by the Drug Enforcement Administration (DEA) as a drug that is used off-label for anti-aging to improve athletic performance. The in-depth review identified possible off-label prescribing and use of Serostim.

Access this alert by clicking the Alert ID # below:

Alert ID: 156263

Do you have an alert to share with other HFPP Members?

You can post them directly to the [HFPP Portal](#) or send them to the Trusted Third Party at ttp@gdit.com.

Want to change how you receive these emails?
You can [update your preferences](#) or [unsubscribe from this list](#).

From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6)

Subject: HFPP Provider Alerts: January 4, 2018

Date: Thu, 4 Jan 2018 09:00:31 -0500

Importance: Normal

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Make sure that you always get our messages: Add ttp@csra.com to your contacts.



January 4, 2018

*Quickly access the portal
by clicking the icon below:*



Dear HFPP Member,

Two new provider alerts are posted to the HFPP Portal:

1. A provider is suspected of reusing disposable single-use anal catheters on multiple patients showing a lack of judgment and placing patients in danger by reusing medical equipment. The provider's medical license has been temporarily suspended.

Access this alert by clicking the Alert ID # below:



2. An investigation identified possible fraud related to inappropriate prescribing of medication. A physician specializing in Family Medicine and Geriatric Care appeared to be prescribing high amounts of

controlled substances (19% controlled and 81% non-controlled substances). The investigation is ongoing.

Access this alert by clicking the Alert ID # below:



Do you have an alert to share with other HFPP Members?
You can post them directly to the [HFPP Portal](#) or send them to the Trusted Third Party at ttp@csra.com.

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CSRA | 3170 Fairview Park Drive | Falls Church, VA 22042

From: Trusted Third Party for HFPP <ttp@csra.com>

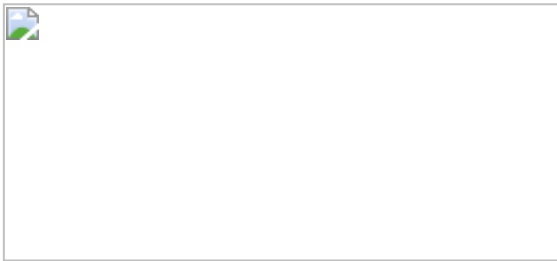
To: (b) (6)

Subject: HFPP Provider Alert: February 26, 2018

Date: Mon, 26 Feb 2018 08:59:29 -0500

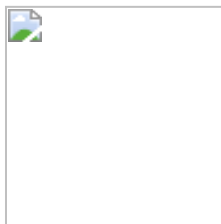
Importance: Normal

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February 26, 2018

*Quickly access the portal
by clicking the icon below:*



Dear HFPP Member,

An out of state pharmacy contacted a physician's office via fax requesting that the physician authorize prescriptions for diabetic testing supplies and topical pain medications. The requests were not necessary or requested by the physician.

Access this alert by clicking the
Alert ID # below:



Do you have an alert to share with other HFPP Members?
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Trusted Third Party at ttp@csra.com.

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This message was sent by CSRA.
CSRA | 3170 Fairview Park Drive | Falls Church, VA 22042

From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6)

Subject: HFPP Provider Alert: August 16, 2017

Date: Wed, 16 Aug 2017 13:58:06 -0400

Importance: Normal

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Provider Alert Posted - August 16, 2017

An investigation identified provider prescription fraud related to inappropriate prescribing of medication. The provider appeared to be prescribing high amounts of controlled substances (82% controlled and 18% non-controlled substances), and was identified as an outlier. Further analysis revealed patients with prescriptions exceeding a daily average of 90 morphine milligram equivalents (MME). The investigation is ongoing.

To learn more, access the [HFPP Portal](#) and follow the instructions below:

1. Click "Partner to Partner Sharing" from the left-hand menu.
2. Click "Provider Alerts."
3. Click ID number "[61895](#)."

Do you have an alert to share with the Partnership? Send an email to ttp@csra.com.

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From: Trusted Third Party for HFPP <ttp@csra.com>

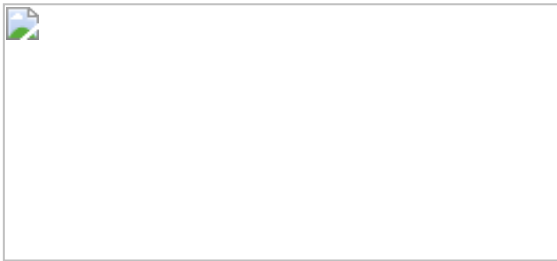
To: (b) (6)

Subject: HFPP Provider Alert: December 06, 2017

Date: Wed, 6 Dec 2017 08:57:53 -0500

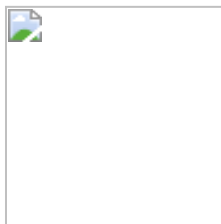
Importance: Normal

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December 6, 2017

*Quickly access the portal
by clicking the icon below:*



Dear HFPP Member,

An investigation identified fraud related to inappropriate prescribing of medication. A physician appeared to be prescribing high amounts of controlled substances that were not supported by claims for medical care. The investigation is ongoing.

Access this alert by clicking the
Alert ID # below:



Do you have an alert to share with other HFPP Members?
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From: Trusted Third Party for HFPP <ttp@csra.com>

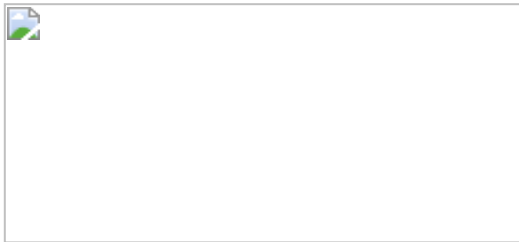
To: (b) (6)

Subject: HFPP Provider Alert: September 27, 2018

Date: Thu, 27 Sep 2018 13:58:28 -0400

Importance: Normal

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September 27, 2018

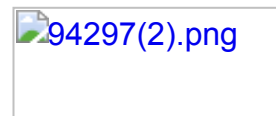
*Quickly access the portal
by clicking the icon below:*



Dear HFPP Member,

A complaint relating to a potential kickback scheme involving behavioral therapy led to a claims review of a provider. The documentation review identified multiple deficiencies and an overpayment. The provider received education and was sent a corrective action notice.

Access this alert by clicking the Alert ID # below:



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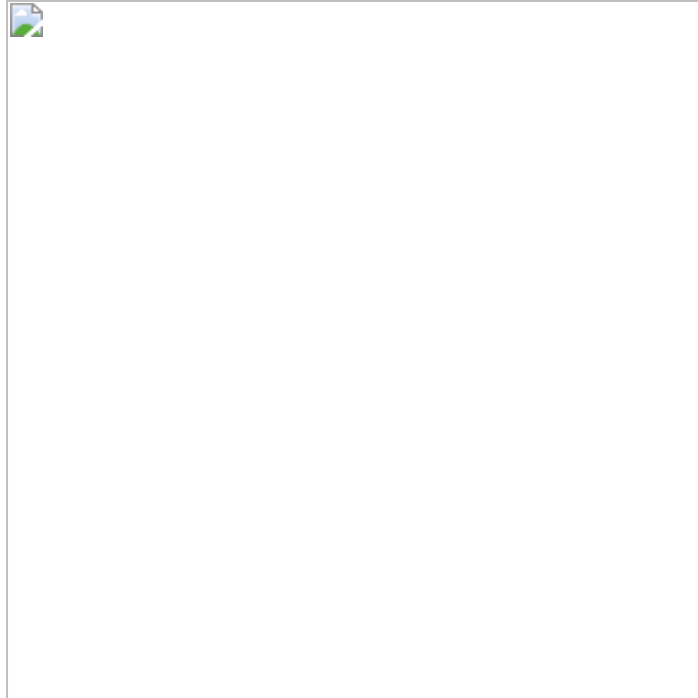
From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6)

Subject: Provider Alert Posted: October 25, 2018

Date: Thu, 25 Oct 2018 18:29:19 +0000

Importance: Normal



New Alert Posted October 25, 2018:

Dear HFPP Member,

An investigation identified potential fraud related to inappropriate billing and prescribing of medication.

An out-of-network provider submitted multiple claims for medications without an active license. Further analysis revealed there were no associated medical claims associated with the prescriptions. The provider was referred to the Centers for Medicare & Medicaid Services (CMS) Predictive Learning Analytics Tracking Outcomes tool (PLATO), and the National Health Care Anti-Fraud Association's (NHCAA) Special Investigation Resource and Intelligence System (SIRIS).

Access this alert by clicking the Alert ID # below:

Alert 99976

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From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6)

Subject: HFPP Provider Alert: February 21, 2018 - Request from HHS OIG

Date: Wed, 21 Feb 2018 13:58:40 -0500

Importance: Normal

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Dear HFPP Member,

The HHS Office of Inspector General (OIG) has an urgent request for all Partners.

February 21, 2018

The OIG is asking Qualifying Health Plans (QHPs) to determine if the identified suspect provider has submitted claims for services rendered to any exchange members. More information on the request and how to contact the OIG is located on the HFPP Portal.

Quickly access the portal by clicking the icon below:



Access this alert by clicking the Alert ID # below:



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From: Trusted Third Party for HFPP <ttp@csra.com>

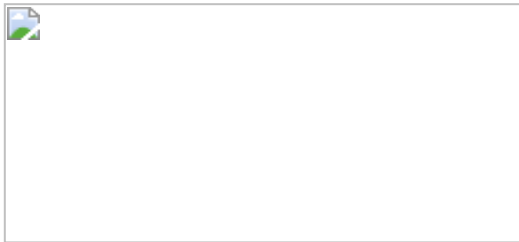
To: (b) (6)

Subject: HFPP Provider Alert: October 4, 2018

Date: Thu, 4 Oct 2018 09:58:19 -0400

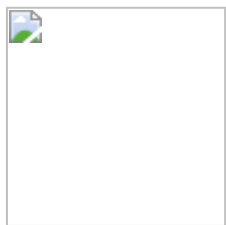
Importance: Normal

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October 4, 2018

*Quickly access the portal
by clicking the icon below:*



Dear HFPP Member,

A pharmacy failed separate desk and Compliance Audit Program (CAP) audits due to high discrepancy rates.

During both audits, the pharmacy was found to have mailed diabetic supplies to out-of-state members without the necessary state licenses. In addition, some prescriptions were submitted with an incorrect day supply enabling early refills and stockpiling.

Access this alert by clicking the Alert ID # below:

 [94905.png](#)

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This message was sent by GDIT.
GDIT | 3170 Fairview Park Drive | Falls Church, VA 22042

From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6)

Subject: HFPP Provider Alert: August 28, 2018

Date: Tue, 28 Aug 2018 13:58:17 -0400

Importance: Normal

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August 28, 2018

*Quickly access the portal
by clicking the icon below:*



Dear HFPP Member,

An out-of-network pharmacy contacted a physician's office via fax requesting that the physician authorize multiple prescriptions for diabetic supplies and topical pain medications. The medications had not been requested by the beneficiary or their physician.

Further analysis could not determine how the pharmacy obtained the beneficiary's protected health information. The investigation is ongoing.

Access this alert by clicking the Alert ID # below:

 [92255.png](#)

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From: Trusted Third Party for HFPP <ttp@csra.com>

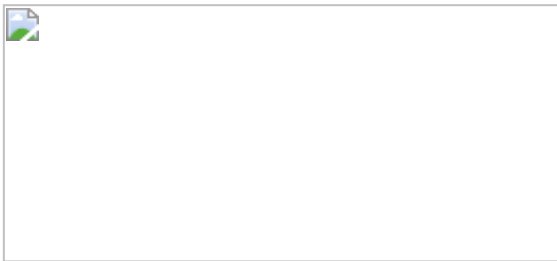
To: (b) (6)

Subject: HFPP Provider Alert: July 2, 2018

Date: Mon, 2 Jul 2018 12:58:11 -0400

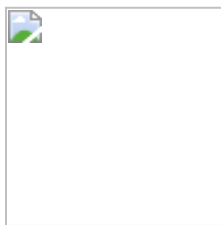
Importance: Normal

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July 2, 2018

*Quickly access the portal
by clicking the icon below:*



Dear HFPP Member,

An investigation identified a provider as being a possible outlier after finding potential fraud related to billings for Applied Behavior Analysis (ABA) therapy services.

The documentation reviewed was either insufficient or did not support the services billed. The provider received education and was sent a corrective action notice.

Access this alert by clicking the Alert ID # below:



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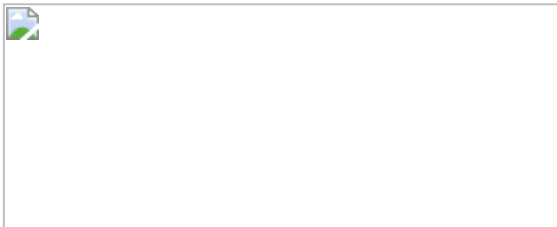
To: (b) (6) (b) (6)

Subject: HFPP Provider Alert: Wednesday May 2, 2018

Date: Wed, 2 May 2018 13:58:18 -0400

Importance: Normal

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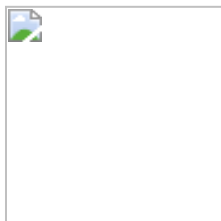


Dear HFPP Member,

An investigation identified potential fraud related to inappropriate billing and billing for services not rendered.

May 2, 2018

*Quickly access the portal
by clicking the icon below:*



A facility used unlicensed professionals to complete medical services and could not provide valid documentation to support the services billed. The investigation also identified a possible common ownership between the referring provider and rendering laboratory. This investigation is ongoing.

Access this alert by clicking the
Alert ID # below:



Do you have an alert to share with other HFPP Members?
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From: Trusted Third Party <ttp@gdit.com>

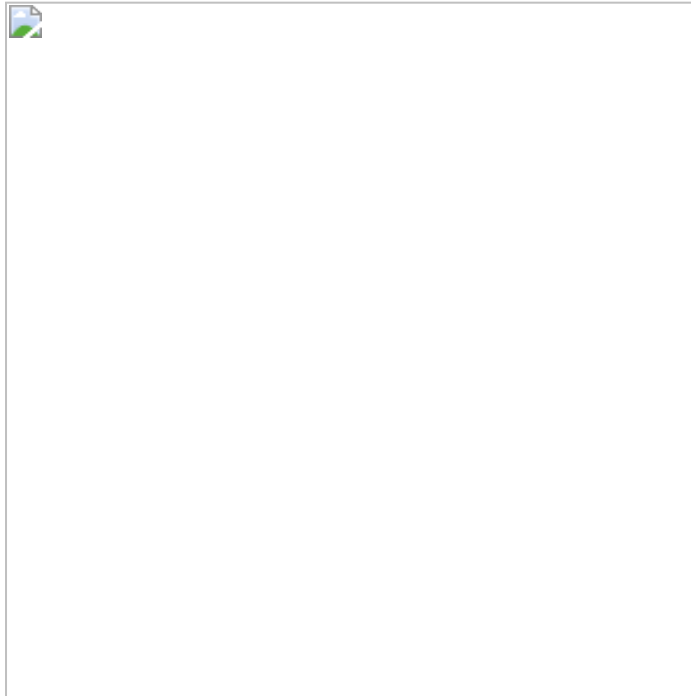
To: (b) (6)

Subject: Provider Alert Posted: June 19, 2019

Date: Wed, 19 Jun 2019 14:59:21 +0000

Importance: Normal





New Alert Posted June 19, 2019:

Dear HFPP Member,

An out-of-network pharmacy contacted multiple physicians via fax requesting authorization for certificates of medical necessity for diabetes supplies. Further analysis revealed that the medications were not requested by the beneficiaries. It is unknown as to how the pharmacy obtained the beneficiary's personally identifiable information (PII) or the physician's information.

Access this alert by clicking the Alert ID # below:

Alert ID: 143161

Do you have an alert to share with other HFPP Members?

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From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6) (b) (6)

Subject: HFPP Provider Alert: October 10, 2017

Date: Tue, 10 Oct 2017 10:56:56 -0400

Importance: Normal

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Provider Alert Posted - October 10, 2017

An investigation identified potential pharmacy fraud related to inappropriate billing of medication, including price gouging and redundant dispensing fees, in violation of the Medicare Advantage and Part D Fraud Handbook. The pharmacy was given 30 days (from September 13, 2017) to appeal audit findings. An entry was made in the National Health Care Anti-Fraud Association's (NHCAA) online Special Investigation Resource and Intelligence System (SIRIS).

To learn more, access the [HFPP Portal](#) and follow the instructions below:

1. Click "Partner to Partner Sharing" from the left-hand menu
2. Click "Provider Alerts"
3. Click ID number "[63377](#)"

Do you have an alert to share with the Partnership? If so, you can post it directly on the [HFPP Portal](#) or send an email to the TTP at ttp@csra.com.

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From: Trusted Third Party <ttp@gdit.com>

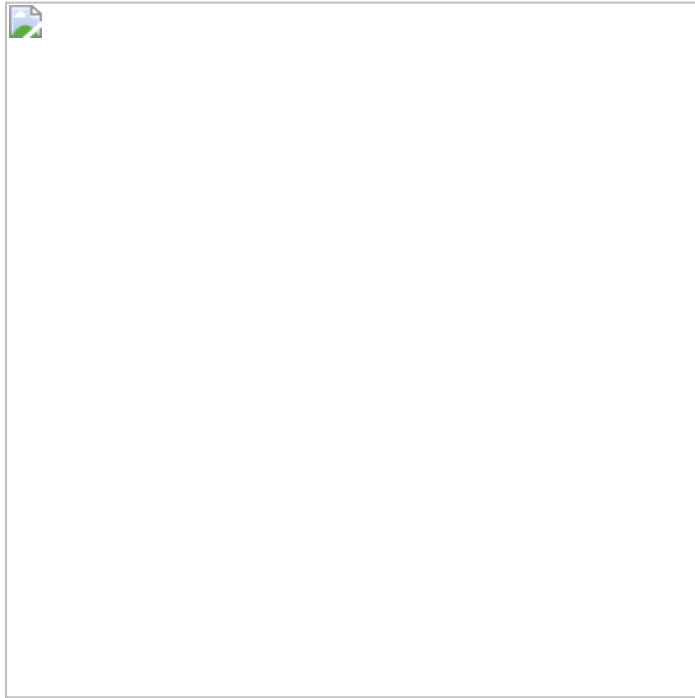
To: (b) (6)

Subject: Provider Alert Posted: March 19, 2019

Date: Tue, 19 Mar 2019 15:59:48 +0000

Importance: Normal





New Alert Posted March 19, 2019:

(b)(7)(E) per FBI

Do you have an alert to share with other HFPP Members?

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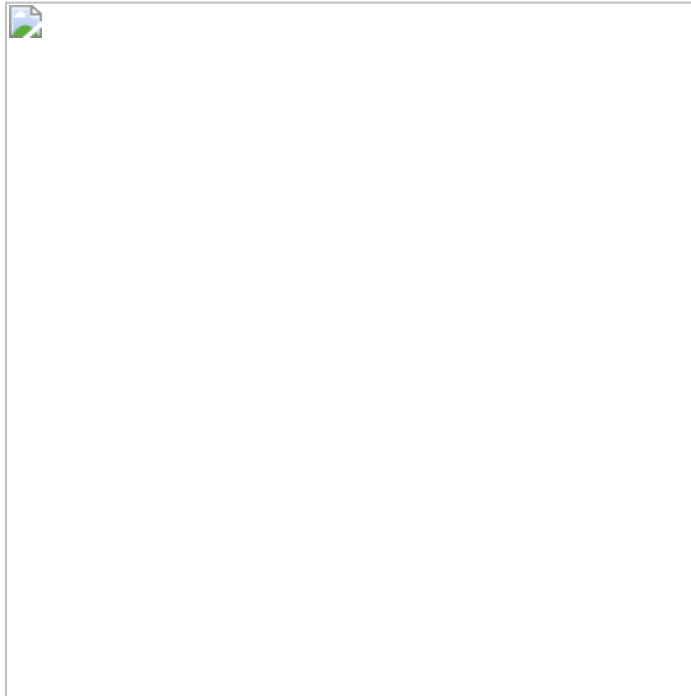
To: (b) (6)

Subject: Provider Alert Posted: April 4, 2019

Date: Thu, 4 Apr 2019 14:59:38 +0000

Importance: Normal





New Alert Posted April 4, 2019:

An internal referral noted potential billing discrepancies for a contracted Applied Behavior Analysis (ABA) service provider. The documentation reviewed was either insufficient or did not support the services billed. The billing deficiencies were conveyed as an overpayment demand to the provider. The settlement/mitigation is pending.

Access this alert by clicking the Alert ID # below:

Alert ID: 128706

Do you have an alert to share with other HFPP Members?

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From: Trusted Third Party <ttp@gdit.com>

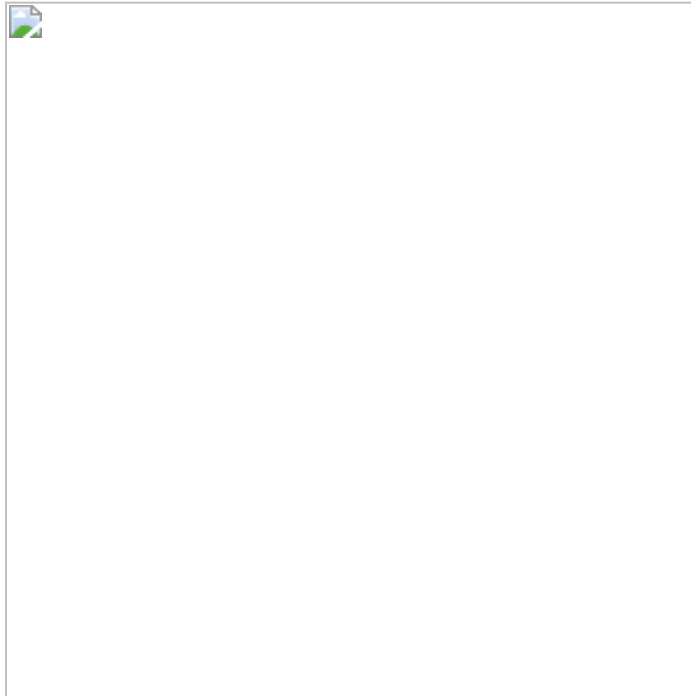
To: (b) (6)

Subject: Provider Alert Posted: August 1, 2019

Date: Thu, 1 Aug 2019 13:09:49 +0000

Importance: Normal





New Alert Posted August 1, 2019:

Dear HFPP Member,

An investigation conducted by Kaiser Permanente's National Fraud Control Unit, came about due to the release of an August 10, 2018 memo released by The Centers for Medicare and Medicaid Services (CMS) entitled "Medicare Part D Coverage of Multi-Ingredient Compounds,". This memo initiated an investigation that identified pharmacy billing discrepancies. The analysis revealed that a long-term care pharmacy was an outlier for compound prescribing. The outlier was found in four prescription Drug Event claims. This investigation lead to the recovery of over \$43,000 in overpayments.

Access this alert by clicking the Alert ID # below:

Alert ID: 151870

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From: Trusted Third Party <ttp@csra.com>

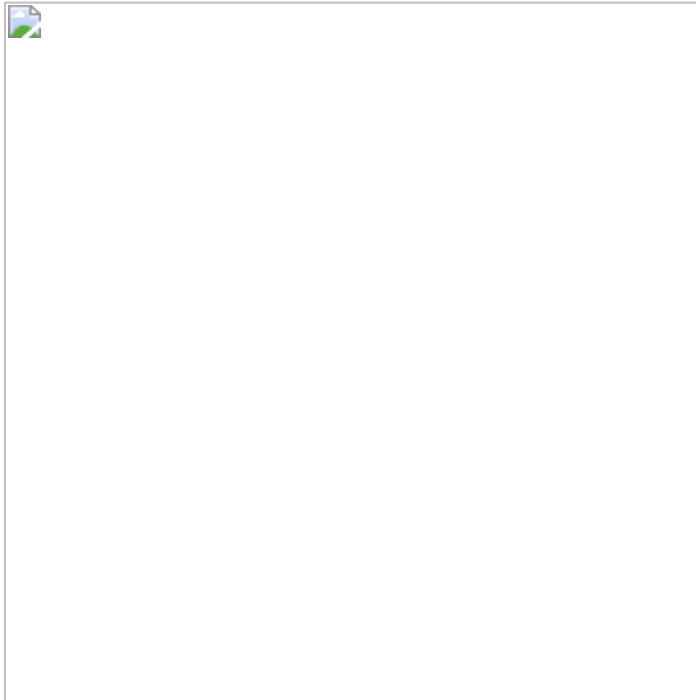
To: (b) (6)

Subject: Provider Alerts Posted: February 26, 2019

Date: Tue, 26 Feb 2019 18:59:42 +0000

Importance: Normal





New Alerts Posted February 26, 2019:

Dear HFPP Member,

Two new provider alerts are posted to the HFPP Portal:

A pharmacy contacted a physician's office via fax requesting authorization of a prescription for high-cost pain medication which the beneficiary did not request. Further analysis could not determine how the pharmacy obtained the beneficiary's protected health information.

Access this alert by clicking the Alert ID # below:

Alert ID: 120402

An investigation identified a provider as being an outlier after finding potential issues related to billings for Applied Behavior Analysis (ABA) therapy services. The documentation reviewed was either insufficient or did not support the services billed. The provider received education and was sent a corrective action notice.

Access this alert by clicking the Alert ID # below:

Alert ID: 120424

Do you have an alert to share with other HFPP Members?

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From: Trusted Third Party <ttp@gdit.com>

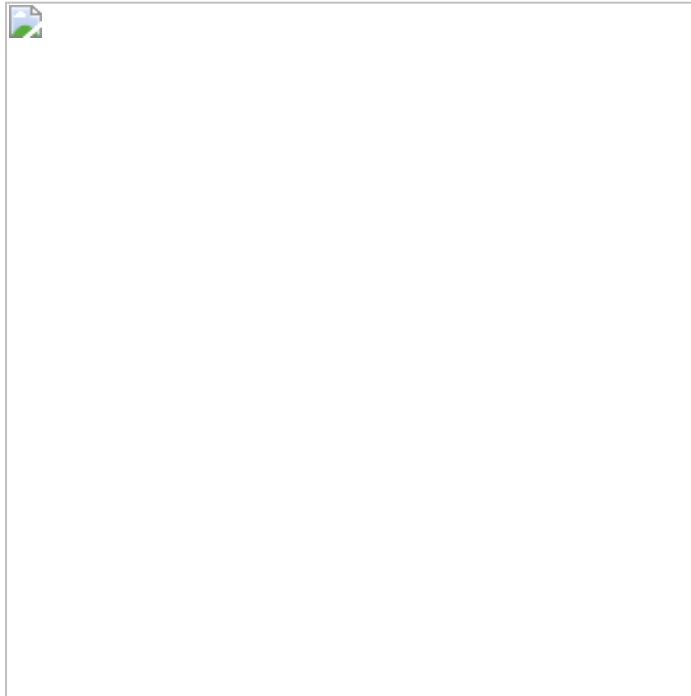
To: (b) (6)

Subject: Provider Alert Posted: July 3, 2019

Date: Wed, 3 Jul 2019 15:03:51 +0000

Importance: Normal





New Alert Posted July 3, 2019:

Dear HFPP Member,

An investigation identified billing discrepancies of an externally contracted Applied Behavior Analysis (ABA) service provider. The billing deficiencies were conveyed as an overpayment demand to the provider and the settlement/mitigation is pending.

Access this alert by clicking the Alert ID # below:

Alert ID: 145472

Do you have an alert to share with other HFPP Members?

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From: Trusted Third Party for HFPP <ttp@csra.com>


To: (b) (6)


Subject: HFPP Provider Alerts: Wednesday, August 1, 2018

Date: Wed, 1 Aug 2018 09:58:17 -0400

Importance: Normal


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August 1, 2018

*Quickly access the portal
by clicking the icon below:*





Dear HFPP Member,

Two new provider alerts have been posted to the HFPP Portal:

The below alerts deal with providers writing high dollar prescriptions being filled by out of state pharmacies without an active license. Investigations are ongoing.

Access these alerts by clicking the Alert ID #'s below:

Do you have an alert to share with other HFPP Members?
You can post them directly to the [HFPP Portal](#) or send them to the Trusted Third Party at ttp@csra.com.

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This message was sent by GDIT.
GDIT | 3170 Fairview Park Drive | Falls Church, VA 22042

From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6)

Subject: HFPP Provider Alerts: Monday April 9, 2018

Date: Mon, 9 Apr 2018 08:57:16 -0400

Importance: Normal

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Dear HFPP Member,

Two new provider alerts have been posted to the HFPP Portal:

April 09, 2018

*Quickly access the portal
by clicking the icon below:*



1. An investigation identified potential fraud related to inappropriate billing for Applied Behavior Analysis (ABA) services. The provider appeared to be billing for more services than approved and for multiple therapists during a single patient session. The investigation is ongoing.

Access this alert by clicking the Alert ID # below:



2. A hotline complaint identified potential fraud related to inappropriate billing for school-based therapy services. The provider appeared to be billing outside of the treatment plan, billing multiple CPT codes for the same time, and reporting the

incorrect place of service. The provider received education and was placed on a corrective action notice.

Access this alert by clicking the Alert ID # below:



Do you have an alert to share with other HFPP Members?
You can post them directly to the [HFPP Portal](#) or send them to the Trusted Third Party at ttp@csra.com.

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This email is being sent to (b) (6)

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This message was sent by CSRA.
CSRA | 3170 Fairview Park Drive | Falls Church, VA 22042

From: Trusted Third Party for HFPP <ttp@csra.com>

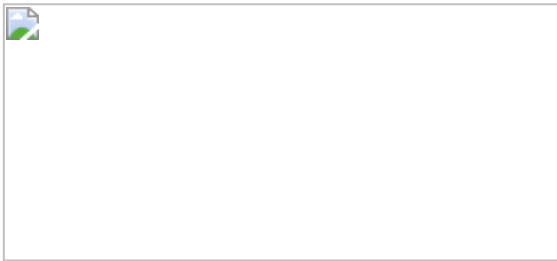
To: (b) (6)

Subject: HFPP Provider Alert: March 12, 2018

Date: Mon, 12 Mar 2018 08:58:40 -0400

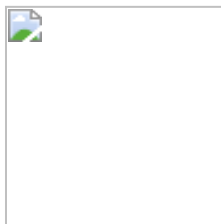
Importance: Normal

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March 12, 2018

*Quickly access the portal
by clicking the icon below:*



Dear HFPP Member,

An out-of-state pharmacy contacted a physician's office via fax requesting that the physician authorize prescriptions for topical pain medication. The medication was not necessary or requested by the member or their treating physician. The investigation is ongoing.

Access this alert by clicking the Alert ID # below:



Do you have an alert to share with other HFPP Members?
You can post them directly to the [HFPP Portal](#) or send them to the Trusted Third Party at ttp@csra.com.

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This message was sent by CSRA.
CSRA | 3170 Fairview Park Drive | Falls Church, VA 22042

From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6)

Subject: 10 NEW HFPP Fraud Alerts Posted to the Portal!

Date: Tue, 1 Aug 2017 09:29:05 -0400

Importance: Normal

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Make sure that you always get our messages: Add ttp@csra.com to your contacts.



10 NEW HFPP Fraud Alerts Posted to the Portal August 1, 2017

Dear HFPP Members,

On July 26th, the Healthcare Fraud Prevention Partnership (HFPP) held a successful Regional Information Sharing Session at the HMS Headquarters in Irving, Texas. It is due to your continued dedication and engagement that the HFPP is able to work together and join forces to combat and prevent healthcare fraud, waste, and abuse.

During the Regional Information Sharing Session, 31 participants from across 17 federal, state, public, and private organizations networked and shared information on recent investigative activities, cases, and fraud schemes. During the session, 10 Case Sharing Alerts were shared and are now posted on the [HFPP Portal](#).

To learn more, follow the instructions below:

1. Log into the [HFPP Portal](#)
2. Click "**Partner to Partner Sharing**" from the left-hand menu
3. Click "**Provider Alerts**" and then on the following ID numbers: [52932](#), [61217](#), [61218](#), [61219](#), [61220](#), [61221](#), [61222](#), [61223](#)
4. Click "**Fraud Scheme/Code Alerts**" and then on the following ID numbers: [61215](#), [61216](#)

Do you have an alert to share with other HFPP members? If so, you can post them directly on the HFPP Portal or send an email to the Trusted Third Party at ttp@csra.com.

Thank you for your continued dedication to the HFPP!

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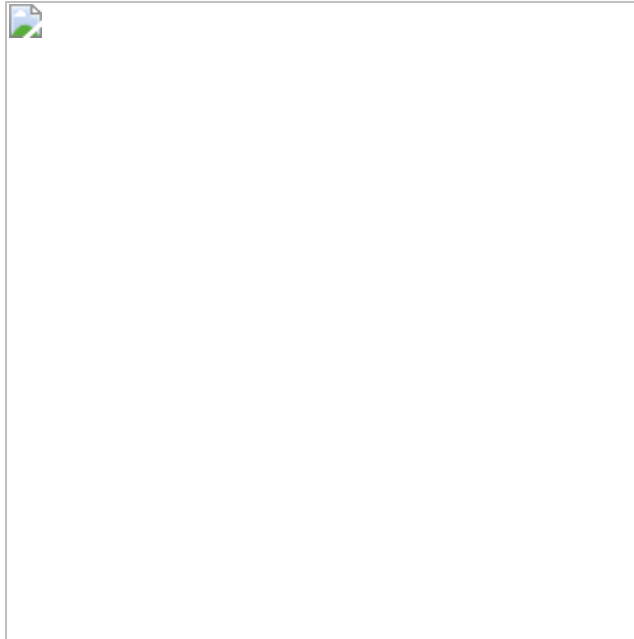
From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6)

Subject: Provider Alerts Posted: December 17, 2018

Date: Mon, 17 Dec 2018 16:59:19 +0000

Importance: Normal



New Alerts Posted December 17, 2018:

Dear HFPP Member,

An investigation identified a higher rate of payment to several providers from pharmaceutical companies manufacturing and marketing a dermatitis medication. Once alerted of the spike, claims were reviewed relative to the 5,000 percent annual increase in dollars paid for this medication.

To access these alerts click on the following ID numbers:

[107427](#), [107425](#), [107423](#), [107421](#)

Do you have an alert to share with other HFPP Members?

You can post them directly to the [HFPP Portal](#) or send them to the Trusted Third Party at ttp@csra.com.

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From: Trusted Third Party <ttp@gdit.com>

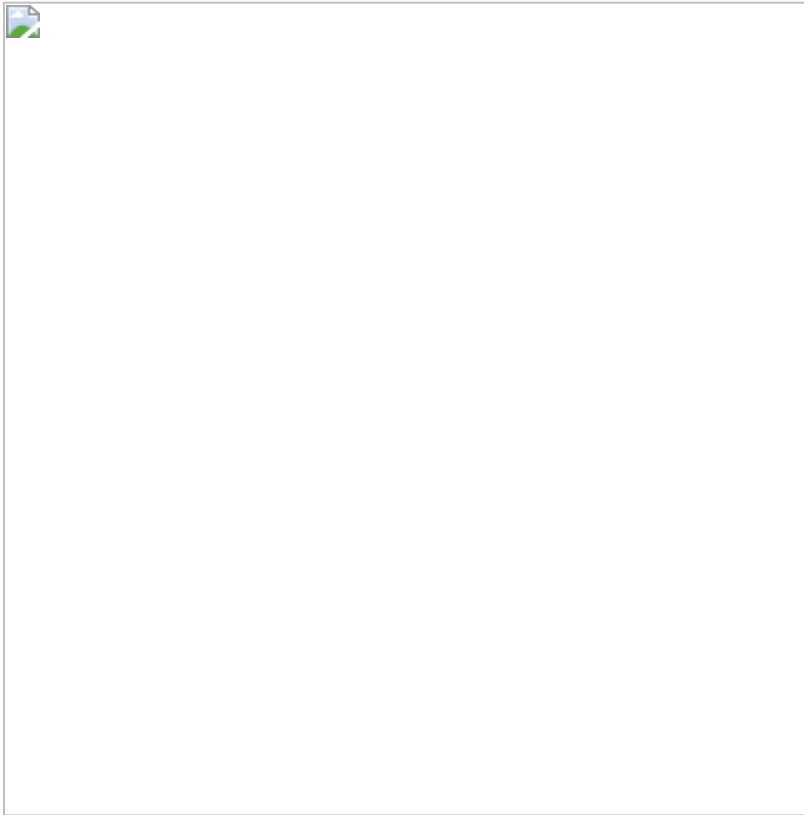
To: (b) (6)

Subject: Provider Alerts Posted: May 15, 2019

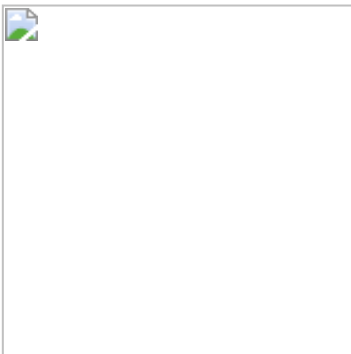
Date: Wed, 15 May 2019 15:00:11 +0000

Importance: Normal





New Alerts Posted: May 15, 2019



Dear HFPP Member,

Investigations identified inappropriate prescribing of opioids, combined with other controlled substances and medications, placing patients at an increased risk of overdose. Further analysis revealed that the providers are outliers for high opioid prescribing.

Access these alerts by clicking the Alert ID #'s below:

[135883](#), [135885](#), [135887](#)

Do you have an alert to share with other HFPP Members?

You can post them directly to the [HFPP Portal](#) or
send them to the Trusted Third Party at ttp@gdit.com.

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From: Trusted Third Party for HFPP <ttp@csra.com>

To: "(b) (6)"

Subject: 10 NEW HFPP Fraud Alerts Posted to the Portal

Date: Fri, 27 Oct 2017 11:56:55 -0400

Importance: Normal

Having trouble viewing this mail? [Click here to view it in your browser.](#)
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Dear HFPP Members,

On October 24th, the Healthcare Fraud Prevention Partnership (HFPP) held a successful Regional Information Sharing Session at Blue Cross & Blue Shield of Illinois (a division of Health Care Service Corporation). During this session, 46 participants from across 19 federal, state, public, and private organizations networked and shared information on recent investigative activities, cases, and fraud schemes. Attendees discussed a wide range of cases and areas of focus. Partners approved the posting of 7 Provider Alerts and 3 Fraud Scheme Notifications to the [HFPP Portal](#).

To learn more, follow the instructions below:

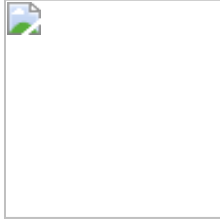
1. To access the **Provider Alerts**, click on the following ID numbers: [63694](#), [63697](#), [63698](#), [63700](#), [63701](#), [63704](#), [63707](#)



October 27, 2017

Quickly access the portal

by clicking the icon below:



2. To access the **Fraud Scheme/Code Alerts**, click on the following ID numbers: [63695](#), [63696](#), [63699](#)

Thank you to all the attendees and to Health Care Service Corporation for hosting a successful event! Your dedication and engagement enable us to join forces to combat and prevent healthcare fraud, waste, and abuse across the healthcare spectrum.

**Is your organization interested in hosting an HFPP event?
Do you have an alert to share with the Partnership?**
If so, send an email to the Trusted Third Party at ttp@csra.com.

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From: Trusted Third Party <ttp@gdit.com>

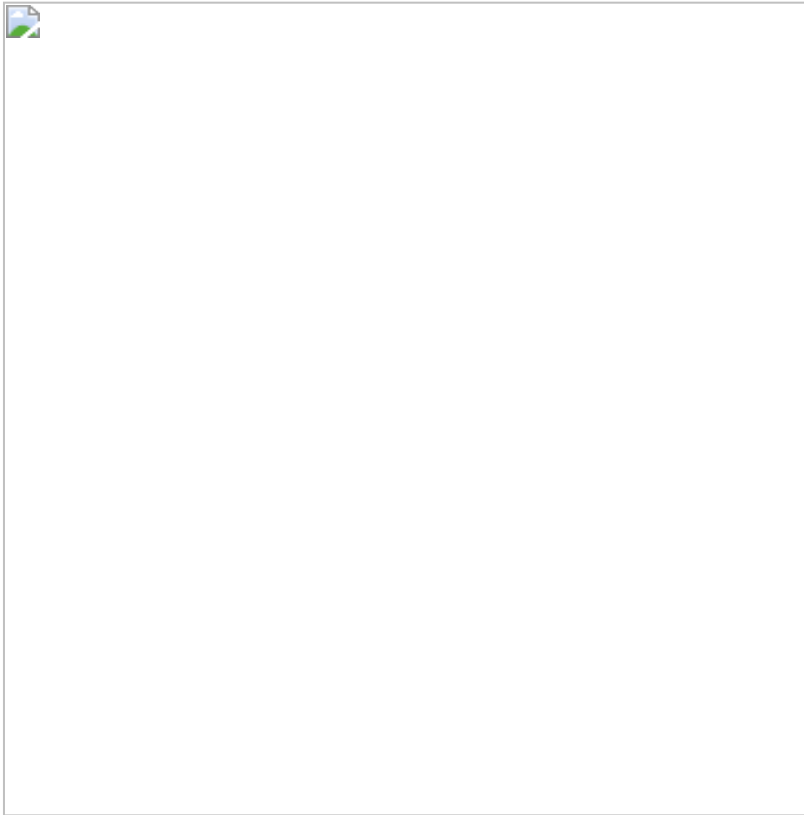
To: (b) (6)

Subject: Provider Alerts Posted: May 6, 2019

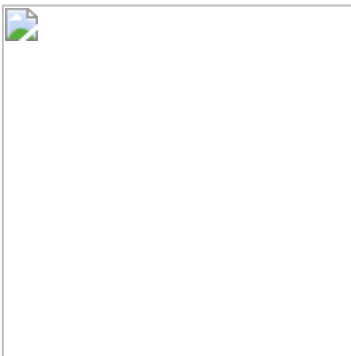
Date: Mon, 6 May 2019 15:03:17 +0000

Importance: Normal





New Alerts Posted: May 6, 2019



An investigation identified inappropriate billing and dispensing of prescriptions for Estradiol medicine patches that were billed but never received. Further analysis revealed that the provider and pharmacy were operating with inactive licenses.

Access this alert by clicking the Alert ID # below:

Alert ID: 132620

A pharmacy submitted claims for medication prescribed by a physician excluded by the Department of Health and Human Services Office of Inspector General for numerous violations. While not yet confirmed, the investigation suggests information sharing and collusion.

Access this alert by clicking the Alert ID # below:

Alert ID: 132618

An investigation revealed billing irregularities for prescriptions including high-cost Non-steroidal Anti-inflammatory Drugs (NSAIDs) and scar gel. Additionally, claims analysis revealed a pattern of unusual billing and prescribing for costly topical pain creams.

Access this alert by clicking the Alert ID # below:

Alert ID: 132616

An investigation identified inappropriate prescribing of medication including unnecessary lidocaine ointment and oral medications. Further analysis revealed that the provider was an outlier for high-cost pain creams and prescription drugs.

Access this alert by clicking the Alert ID # below:

Alert ID: 131542

Do you have an alert to share with other HFPP Members?

You can post them directly to the [HFPP Portal](#) or
send them to the Trusted Third Party at ttp@gdit.com.

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From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6)

Subject: HFPP Provider Alert: August 7, 2017

Date: Mon, 7 Aug 2017 13:58:57 -0400

Importance: Normal

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Provider Alert Posted

An investigation identified laboratory fraud related to inappropriate prescribing and billing of medication. Information from the July 2017 CMS Release Medicare Strike Force Takedown and a review of claims revealed that 23 laboratory claims were paid for one Medicare beneficiary. Further investigation confirmed that claims were submitted on the same date of service and deemed unnecessary since the patient was not prescribed the medications being tested.

Information regarding the inappropriately paid claims was provided to the following sources to assist in the indictment: National Benefit Integrity Medicare Drug Integrity Contractor (NBI MEDIC), CMS Predictive Learning Analytics Tracking Outcomes tool (PLATO), and National Health Care Anti-Fraud Association's (NHCAA) online Special Investigation Resource and Intelligence System (SIRIS).

To learn more, access the [HFPP Portal](#) and follow the instructions below:

1. Click "Partner to Partner Sharing" from the left-hand menu
2. Click "Provider Alerts"
3. Click ID number "[61600](#)"

Do you have an alert to share with the Partnership? If so, you can post it directly on the [HFPP Portal](#) or send an email to the TTP at ttp@csra.com.

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From: Trusted Third Party for HFPP <ttp@csra.com>

(b) (6)

Subject: HFPP Provider Alerts: January 18, 2018

Date: Thu, 18 Jan 2018 11:00:34 -0500

Importance: Normal

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January 18, 2018

*Quickly access the portal
by clicking the icon below:*



Dear HFPP Member,

Two possible instances of patient brokering were identified through third-party premium payments. The first alert involves a recovery center owner; the second alert involves a representative of a residential recovery program. This practice is discouraged as it can alter the insurance risk pool and create an unfair advantage in the Marketplace; for this reason, the Department of Health and Human Services (HHS) discourages the acceptance of such payments.

Access these alerts by clicking the Alert IDs # below:



Do you have an alert to share with other HFPP Members?
You can post them directly to the [HFPP Portal](#) or send them to the
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From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6)

Subject: HFPP Provider Alert: January 31, 2018

Date: Wed, 31 Jan 2018 13:07:09 -0500

Importance: Normal

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January 31, 2018

*Quickly access the portal
by clicking the icon below:*



Dear HFPP Member,

An investigation identified potential fraud related to inappropriate laboratory billing. A provider appeared to be submitting claims with drug testing codes for out-of-state patients without additional medical services. Further analysis revealed that the hospital is affiliated with a laboratory that is a known participant in a nationwide urine drug testing fraud scheme. The hospital was placed on 100% prepayment review and other related facilities were placed on review to prevent future exposure to fraudulent lab charges.

Access this alert by clicking the
Alert ID # below:



Do you have an alert to share with other HFPP Members?
You can post them directly to the HFPP Portal or send them to the

Trusted Third Party at ttp@csra.com.

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From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6)

Subject: New Alerts Posted to HFPP Portal!

Date: Thu, 31 Jan 2019 18:59:49 +0000

Importance: Normal

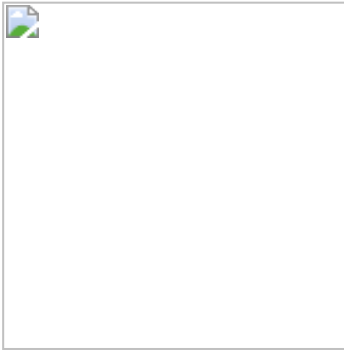




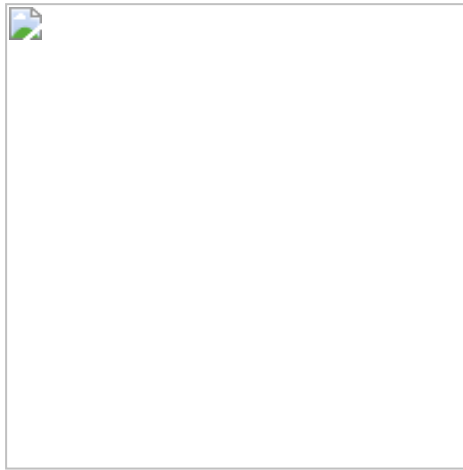
Dear HFPP Members,

The HFPP held a joint Regional Information Sharing Session with the National Health Care Anti-Fraud Association (NHCAA) on January 17th in Rancho Cordova, California. Attendees from across federal, state, private and public organizations acquired the latest information on law enforcement activities and discussed actionable leads from a wide range of fraud schemes and cases. To learn more about this event, view the [Executive Summary](#).

Additionally, the following nine Provider Alerts and three Fraud Scheme Alerts were approved for posting:



[116543](#), [116545](#), [116547](#), [116734](#), [116758](#), [116761](#), [116812](#), [116815](#), [116819](#)



[116740](#), [116824](#), [116857](#)

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From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6)

Subject: Three NEW HFPP Fraud Alerts Posted to the Portal

Date: Thu, 3 Aug 2017 08:57:58 -0400

Importance: Normal

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Three NEW HFPP Fraud Alerts Posted to the Portal August 3, 2017

Dear HFPP Members,

We are pleased to announce that three additional provider/fraud scheme alerts have been posted to the Healthcare Fraud Prevention Partnership (HFPP) Portal.

These three cases were discussed during the July 26th Regional Information Sharing Session at HMS Headquarters in Irving, Texas, and can be accessed by following the instructions below:

1. Log into the [HFPP Portal](#)
2. Click “**Partner to Partner Sharing**” from the left-hand menu
3. Click “**Provider Alerts**” and then on the following ID numbers: [61615](#)
4. Click “**Fraud Scheme/Code Alerts**” and then on the following ID numbers: [61605](#), [61613](#)

Do you have an alert to share with other HFPP members? You can post them directly on the HFPP Portal or send them directly to the Trusted Third Party at ttp@csra.com.

We appreciate your continued dedication to the HFPP!

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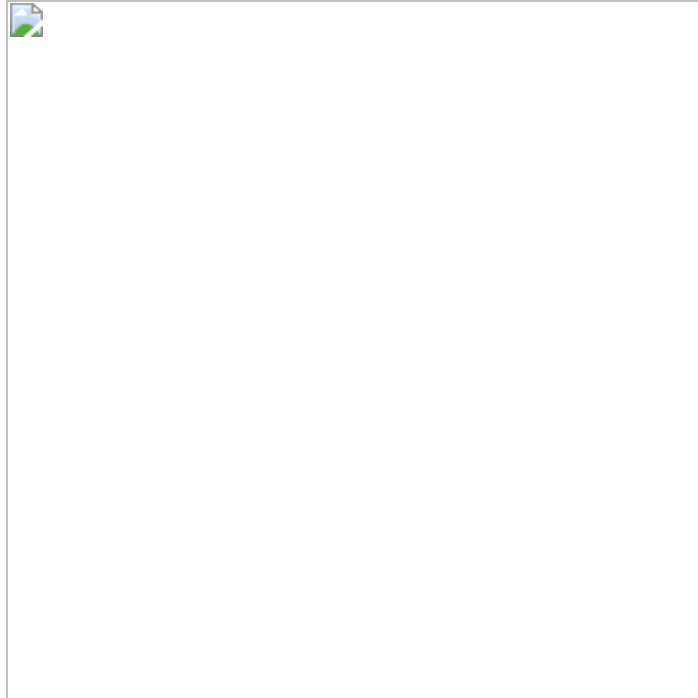
From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6)

Subject: Provider Alert Posted: December 18, 2018

Date: Tue, 18 Dec 2018 18:59:19 +0000

Importance: Normal



New Alert Posted December 18, 2018:

Dear HFPP Member,

The HHS Office of Inspector General (OIG) is asking all Qualifying Health Plans to determine if identified suspect providers/pharmacies have:

- Sent/received correspondence or education regarding any of the providers' opioid related prescribing/dispensing habits
- Conducted medical records review regarding any of the providers' opioid related prescribing/dispensing habits
- Informed any of the providers that their patients might be doctor shopping
- Performed audits of the pharmacies

More information on the request and how to contact the OIG is located on the HFPP Portal.

Access this alert by clicking the Alert ID # below:

Alert 108478

Do you have an alert to share with other HFPP Members?

You can post them directly to the [HFPP Portal](#) or send them to the Trusted Third Party at ttp@csra.com.

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From: Trusted Third Party <ttp@gdit.com>

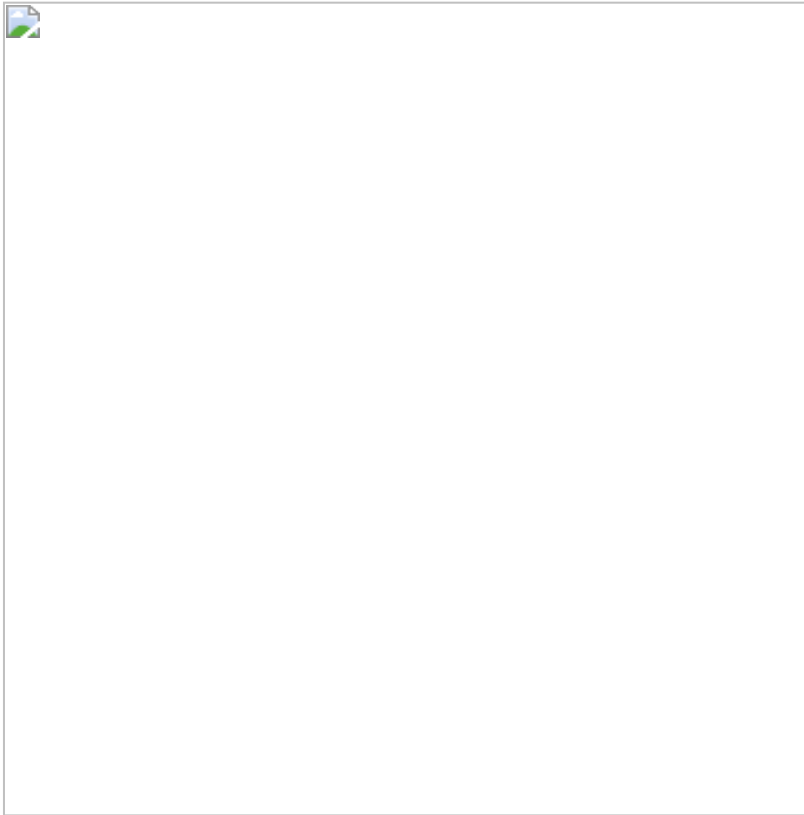
To: (b) (6)

Subject: Provider Alerts Posted: April 2, 2019

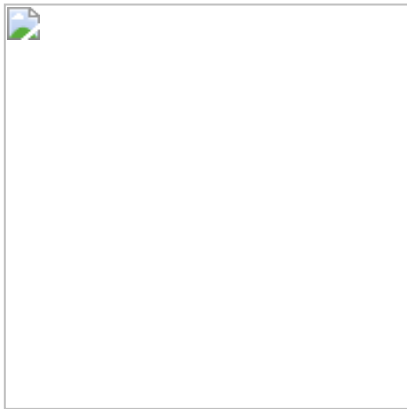
Date: Tue, 2 Apr 2019 14:59:21 +0000

Importance: Normal





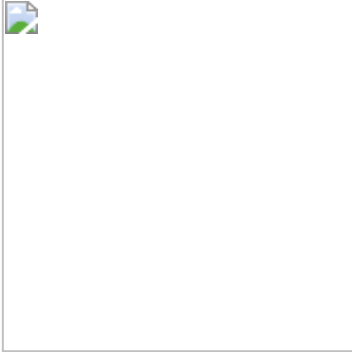
New Alerts Posted: April 2, 2019



A laboratory is suspected of being an intermediary between nationwide medical providers and out-of-network independent laboratories, facilitating fraudulent claims submissions through unrelated in-network providers with the intent to collect payment for non-rendered services. Medical records confirm that multiple laboratories are performing the drug tests, not the clinics in which the providers are affiliated. The providers were referred to law enforcement and have been placed on pre-payment review.

Access this alert by clicking the Alert ID # below:

Alert ID: 127659



A medical center received multiple faxes from a specialty pharmacy requesting prescriptions which are potentially fraudulent as both the beneficiary and their physicians did not request the medications. Additionally, the faxes contained protected health information and it is unknown how the pharmacy obtained this information. The Pharmacy was identified as high-risk in 2018.

Access this alert by clicking the Alert ID # below:

Alert ID: 127594

Do you have an alert to share with other HFPP Members?

You can post them directly to the [HFPP Portal](#) or send them to the Trusted Third Party at ttp@gdit.com.

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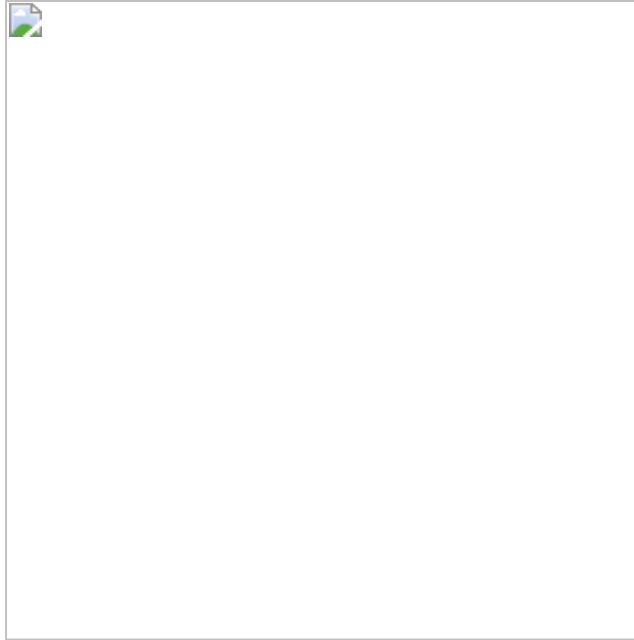
From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6)

Subject: HFPP Provider Alerts

Date: Mon, 14 Jan 2019 16:59:30 +0000

Importance: Normal



New Alerts Posted January 14, 2019:

Dear HFPP Member,

An investigation revealed billing irregularities for prescriptions authorized by physicians under the HealthRight Telemedicine Scheme. In addition, claims analysis showed a pattern of telemedicine providers prescribing high-cost topical creams to their patients.

To access these alerts, click the following ID numbers:

[112098](#) [112101](#)

Do you have an alert to share with other HFPP Members?

You can post them directly to the HFPP Portal or send them to the Trusted Third Party at ttp@csra.com.

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From: Trusted Third Party for HFPP <ttp@csra.com>

To: (b) (6)

Subject: HFPP Provider Alert: January 11, 2018

Date: Thu, 11 Jan 2018 08:59:45 -0500

Importance: Normal

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January 11, 2018

*Quickly access the portal
by clicking the icon below:*



Dear HFPP Member,

An investigation identified potential fraud related to inappropriate prescribing of medication. A physician appeared to be prescribing large quantities of multiple opioids that exceeded current dosage guidelines, placing patients at risk. The investigation is ongoing.

Access this alert by clicking the Alert ID # below:



Do you have an alert to share with other HFPP Members?
You can post them directly to the [HFPP Portal](#) or send them to the Trusted Third Party at ttp@csra.com.

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Violent & Major Crimes Section

Non-responsive Records

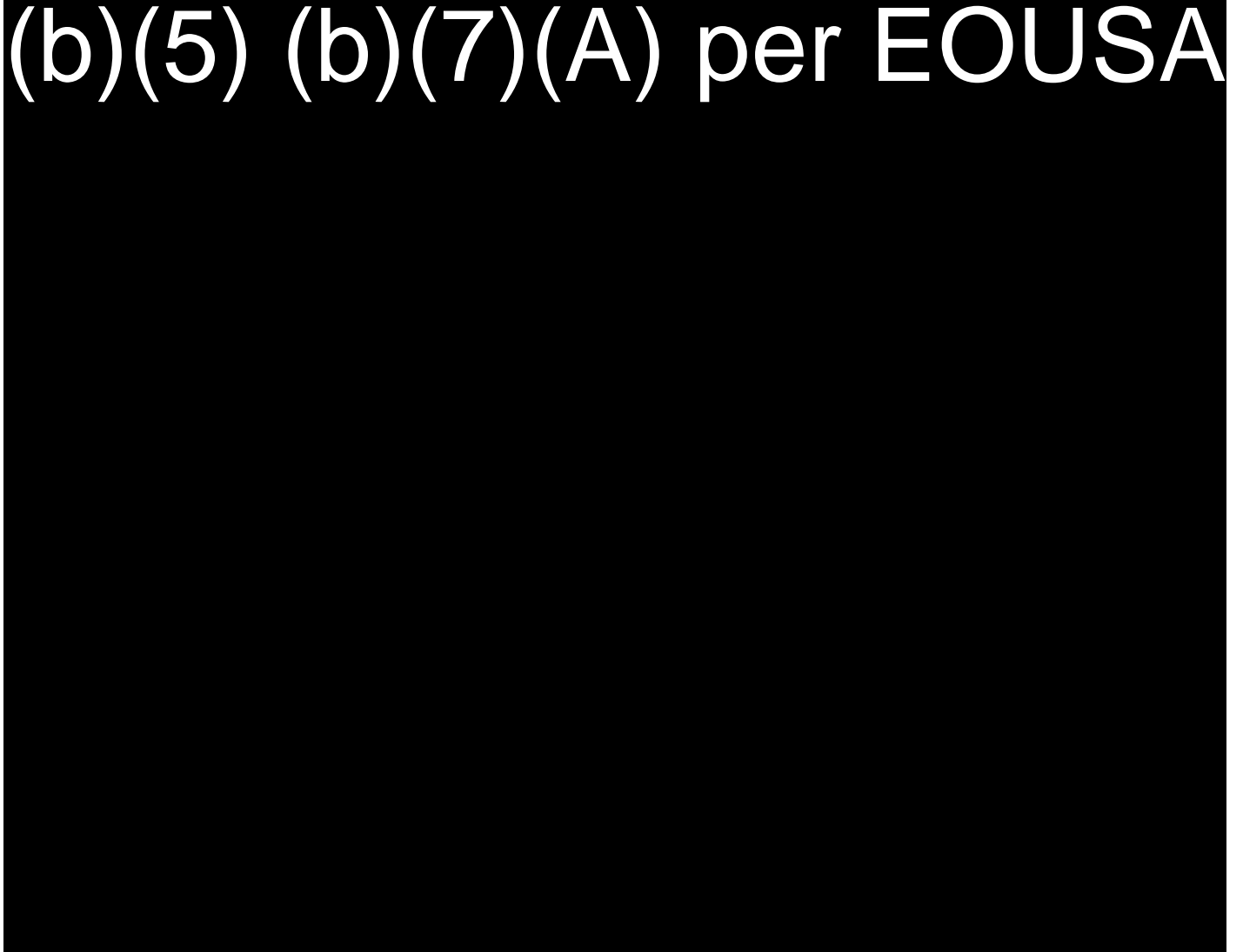
Non-responsive Records

(b)(6) (b)(7)(A) (b)(7)(C) per EOUSA

(b)(6) (b)(7)(A) (b)(7)(C) per EOUSA

Non-responsive Records

(b)(5) (b)(7)(A) per EOUSA



Narcotics & OCDETF Section

Non-responsive Records

