FRAUD AND ABUSE CORRECTIVE ACTION PROCEDURE

Steps to follow if a provider fails to comply With VFC Program requirements

Mishandling of VFC vaccine
- Improper storage & handling of vaccine
- Unaccounted for, lost, wasted/expired vaccine

Billing & Office Practices
- Billing for VFC vaccine (any source)
- Charging more than a $23.03 administration fee for uninsured, American Indian/Alaska Native, underinsured patients
- Failure to maintain VFC records for required time period
- Failure to comply with VFC ordering or site visit requirements

Misuse of VFC vaccine
- Refusing to provide VFC-eligible children with VFC vaccine due to inability to pay administration fee
- Using VFC vaccine on non-VFC eligible children
- Transfer of VFC vaccine to another site without approval of program
- Routine borrowing of VFC vaccine for use on non-VFC eligible patients
- No private purchase vaccine, but provider profile indicates privately insured children

Previous Compliance Issue

No Previous Compliance Issues

Secondary Education

Correction through Site Visit Technical Assistance or VFC Site Visit Follow-up

Research Issue

Secondary or Tertiary Education (LHD discretion)

Issue resolved?

Yes

No

Termination from VFC Program

Referral to MDHHS for fraud & abuse investigation

Issue resolved?

Yes

No

Termination from VFC Program

Intervention by MDHHS Field Representative

2 years or fewer between issues

More than 2 years between issues

Different Issue

Same Issue

See next page for outline of requirements of Secondary and Tertiary Education.
Secondary Education

- Provider is educated regarding VFC Program requirements
- Provider submits written corrective action (CA) plan to LHD
- LHD conducts 1-2 Follow-ups (e-mail, phone or in-person) post identification of the issue
- At LHD discretion, provider completes VFC and/or Storage and Handling INE training

Tertiary Education

- Provider is educated regarding VFC Program requirements
- LHD develops specific corrective action (CA) plan and sends written notification
- LHD conducts 2-3 Follow-ups (e-mail, phone or in-person) post notification to ensure CA plan is being followed
- Provider completes VFC and/or Storage and Handling INE training
- LHD conducts in-person visit 3-6 months after implementation of CA plan to assess provider compliance