



INNOVATIVE FINANCIAL GROUP

SUPPLEMENTAL TRAINING

May 2023



Training Overview

Innovative Financial Group (IFG) has designed this training to cover additional items relevant to a robust compliance program for all employees and contractors supporting Medicare products.

Fraud, Waste, and Abuse (FWA)

The detection, correction, and prevention of FWA is essential to maintain a healthcare system that is affordable for everyone. State and federal law enforcement agencies are increasingly focusing on investigating healthcare FWA.

Examples of FWA include but are not limited to:

- Defrauding or attempting to defraud the healthcare system
- Lying, using false pretenses, or making false statements or promises to get money from the healthcare system
- Using the identifying information of another person to defraud the healthcare system
- Misusing resources or services, which results in unnecessary costs to the healthcare system

Even if you don't intend to lie or misrepresent facts, you could still be committing fraud, waste and abuse if you are paid by the healthcare system but are not actually entitled to the money.



Fraud, Waste, and Abuse (FWA)

Requirement to report FWA

- Everyone who performs a function that in some way supports IFG business is required to report suspected FWA via the ethics hotline: **1-888-230-4144**. This is anonymous and is available 24/7.
- This hotline is designed to function as a reporting mechanism to ensure all issues are identified and addressed.
- Failure to report any suspected or detected noncompliant activity may result in disciplinary action up to and including termination.
- Refer to IFG Policy and Procedure document section 1.5 for full guidance.





Gift Guidelines and Restrictions

Innovative Financial Group restricts gifts, only permitting nominal gifts (\$15 or less) to potential enrollees, provided the gift is given regardless of whether they enroll and without discrimination.

The following rules apply to nominal gifts:

- If a nominal gift is a chance to receive one large gift or a communal experience (e.g., a concert, raffle, drawing), the total fair market value must not exceed the nominal per person value based on anticipated attendance.
- For example, if 10 people are expected to attend an event, the nominal gift may not be worth more than \$150 (\$15 for each of the 10 anticipated attendees).
- Anticipated attendance must be based on venue size, response rate, and/or advertisement circulation.
- Nominal gifts may not be in the form of cash or other monetary rebates even if their worth is \$15 or less.



Gift Guidelines and Restrictions

- Meals are not permitted at sales/marketing events. Refreshments and light snacks may be provided.
- Plans/Part D sponsors should ensure that items provided could not be reasonably considered a meal and/or that multiple items are not being “bundled” and provided as if a meal.
- Meals may be provided at CMS-defined educational events and other events only if they fall outside of sales/marketing. Consult your leadership for full guidance prior to hosting such an event to ensure it is properly categorized and conducted.
- Refer to IFG Policy and Procedure document section 2.20 for full guidance.

IFG Federal Screenings



IFG is committed to performing appropriate Federal screenings for all associates.

- Anyone that the Federal Government designates as excluded to support a Government contract may not perform any function in support of the contract. This applies to agents and non-agents, employees and contractors.
- Persons or entities that appear on OIG or GSA sanctions lists will be terminated or removed from supporting/access to any related systems or information.
- These screenings are performed upon hire and every month thereafter.
- Refer to IFG Policy and Procedure document section 1.7 for full guidance.



Questions?

- For any questions, please reach out to your leader and/or compliance@teamifg.com.