

# Molina Healthcare of South Carolina Fraud, Waste & Abuse (FWA) Training

For Providers, Staff, and Contractors

2025 / Molina Healthcare of SC Provider  
Relations



# Why FWA Training Matters

## The Cost of Fraud:

- Medicaid fraud costs the U.S. **billions** annually — roughly **\$100 million lost every day**.
- These losses reduce funds available for legitimate member care and vital health programs.

## Impact on Care & Trust:

- Fraud, waste, and abuse drive up healthcare costs for everyone.
- It can lead to reduced access, lower quality of care, and diminished trust in the healthcare system.

# Why FWA Training Matters

## Your Role in Compliance:

- South Carolina Medicaid Managed Care regulations and Molina's compliance policies require annual FWA training.
- Training equips you to recognize red flags, prevent violations, and protect our members and organization.

## Bottom Line:

- Every employee and provider plays a role in safeguarding program integrity, ensuring funds are used **for care — not crime.**

# Your Role in Prevention

Your actions directly protect our members, our organization, and the integrity of the SC Medicaid program.

- **Follow Molina's Code of Conduct & Compliance Program**
  - Adhere to all ethical, legal, and professional standards.
  - Apply these guidelines in daily decision-making.
- **Report Suspected Violations Promptly**
  - Use designated reporting channels (Compliance Hotline, supervisor, or Compliance Officer).
  - Even if unsure, report concerns — early reporting can prevent larger issues.
- **Complete Annual Fraud, Waste & Abuse (FWA) Training**
  - Keep training up to date and document completion.
  - Review past training materials to stay aware of evolving rules and risks.
- **Remember:** Prevention starts with awareness, attention to detail, and speaking up when something doesn't seem right.

# Definitions

- Fraud – Intentional deception for unauthorized benefit
  - Waste – Misuse of resources without need (not usually criminal)
  - Abuse – Practices inconsistent with accepted standards, causing unnecessary costs

## Examples

- Fraud: Billing for services not rendered, upcoding, falsifying records
  - Waste: Ordering unnecessary tests or services
  - Abuse: Providing services that are not medically necessary

# Key Federal & State Laws Protecting Medicaid Integrity

- **False Claims Act (FCA)**
  - Prohibits knowingly submitting false or fraudulent claims for payment.
  - Penalties: \$5,500–\$11,000 per claim **plus** up to triple the damages.
  - Includes knowingly retaining overpayments.
- **Anti-Kickback Statute**
  - Criminal offense to offer, pay, solicit, or receive anything of value to induce referrals for services covered by federal health care programs.
- **Beneficiary Inducement Law**
  - Restricts offering items/services to beneficiaries that could influence their choice of provider.
- **Stark Law (Physician Self-Referral)**
  - Bans physicians from referring patients to entities with which they (or their family members) have a financial relationship, for certain designated services.

# Key Federal & State Laws Protecting Medicaid Integrity

## Civil Monetary Penalties Law

- Authorizes monetary penalties for a variety of fraudulent or abusive conduct, including improper claims and beneficiary inducements.

## HIPAA Privacy & Security

- Protects the confidentiality, integrity, and availability of patient health information; violations can result in severe fines and penalties.

## SC Medicaid Program Integrity Requirements

- State-specific rules mandating compliance, reporting, and cooperation in preventing fraud, waste, and abuse within South Carolina's Medicaid program.

# Whistleblower Protections

## What is a Whistleblower?

A person who reports suspected fraud, waste, or abuse — or other illegal or unethical activity — to the appropriate authorities.

## Qui Tam Provisions (False Claims Act)

- Allow private individuals to file lawsuits on behalf of the U.S. Government for false claims.
- **Potential Awards:** 15–30% of the total funds recovered.

## Protections from Retaliation

- It is illegal to fire, demote, harass, or otherwise retaliate against a whistleblower for making a good-faith report.
- Remedies include:
  - **Reinstatement** to the same or similar position
  - **Back Pay** for lost wages
  - **Compensation for damages** (emotional distress, attorney's fees, etc.)

## Why This Matters to You

- Encourages reporting of misconduct without fear of personal or professional harm.
- Supports a culture of integrity and compliance within Molina Healthcare and South Carolina Medicaid.



# Molina SC Compliance Expectations

## Training & Awareness

- Provide ongoing training to all staff, contractors, and providers on:
  - Fraud, Waste, and Abuse (FWA) prevention
  - Ethical decision-making in healthcare
  - Applicable federal and South Carolina state laws

## Policy Development & Enforcement

- Maintain clear, written policies for **prevention**, **detection**, and **correction** of compliance issues.
- Ensure policies are accessible, understood, and consistently applied.

## Collaboration & Accountability

- Cooperate fully with internal and external **audits**, **reviews**, and **investigations**.
- Respond promptly to compliance inquiries from Molina or state regulators.

## Ethics & Integrity

- Avoid actual or perceived **conflicts of interest** in all business dealings.
- Promote a culture where integrity, transparency, and accountability are expected at every level.

# Provider Responsibilities

## Verify Member Eligibility Before Services

- Confirm Medicaid and Molina SC coverage **before each visit** using approved verification systems.
- Identify service limits or prior authorization requirements to avoid billing errors.

## Bill Only for Medically Necessary, Documented Services

- Submit claims only for services that are **clinically appropriate** and **fully supported** by documentation.
- Avoid upcoding, unbundling, or billing for services not rendered.

## Maintain Accurate & Complete Records

- Keep clear, legible, and detailed patient records in compliance with state and federal retention requirements.
- Ensure documentation supports **diagnoses, treatment plans, and billed services**.

## Ensure Subcontractors & Partners Meet Compliance Standards

- Confirm that all business associates, contractors, and partners comply with **Molina SC, Medicaid, and federal requirements**.
- Maintain written agreements outlining compliance obligations.

# Reporting FWA

- Molina AlertLine:
  - (866) 606-3889 | [MolinaHealthcare.Alertline.com](https://MolinaHealthcare.Alertline.com)
  - SC DHHS Fraud Hotline: (888) 364-3224 | [fraudres@scdhhs.gov](mailto:fraudres@scdhhs.gov)
  - Reports can be anonymous
  - Include as much detail as possible

# Non-Retaliation Policy

## Our Commitment

- Molina strictly prohibits retaliation against anyone who makes a **good-faith report** of suspected fraud, waste, abuse, or any other compliance concern.

## What is Retaliation?

- Any adverse action taken against a person for reporting a concern or participating in an investigation.
- Examples include:
  - Termination, demotion, or suspension
  - Reduction in hours or pay
  - Harassment, intimidation, or threats
  - Negative changes to work assignments

# Non-Retaliation Policy

## Legal Protections

- Federal and South Carolina laws protect whistleblowers from retaliation.
- Protections apply whether the concern is substantiated or not — as long as the report was made in **good faith**.

## How We Support You

- Reports can be made **confidentially** through Molina's Compliance Hotline or designated reporting channels.
- Molina will promptly investigate all concerns and take corrective action if retaliation occurs.

# Key Takeaways

- Understand FWA definitions and examples
  - Know your legal and contractual obligations
  - Report concerns promptly through proper channels
  - Maintain a culture of compliance and ethics

# Molina Provider Training Survey

The Molina Provider Relations Team hopes you have found this training session beneficial.



Please share your feedback with us so we can continue to provide you with excellent customer service!

Please take a few minutes to complete the [Molina Provider Training](#) survey to provide feedback on this session. The survey is located on the [You Matter to Molina Page](#) of our Provider Website, under the “Communications” tab.

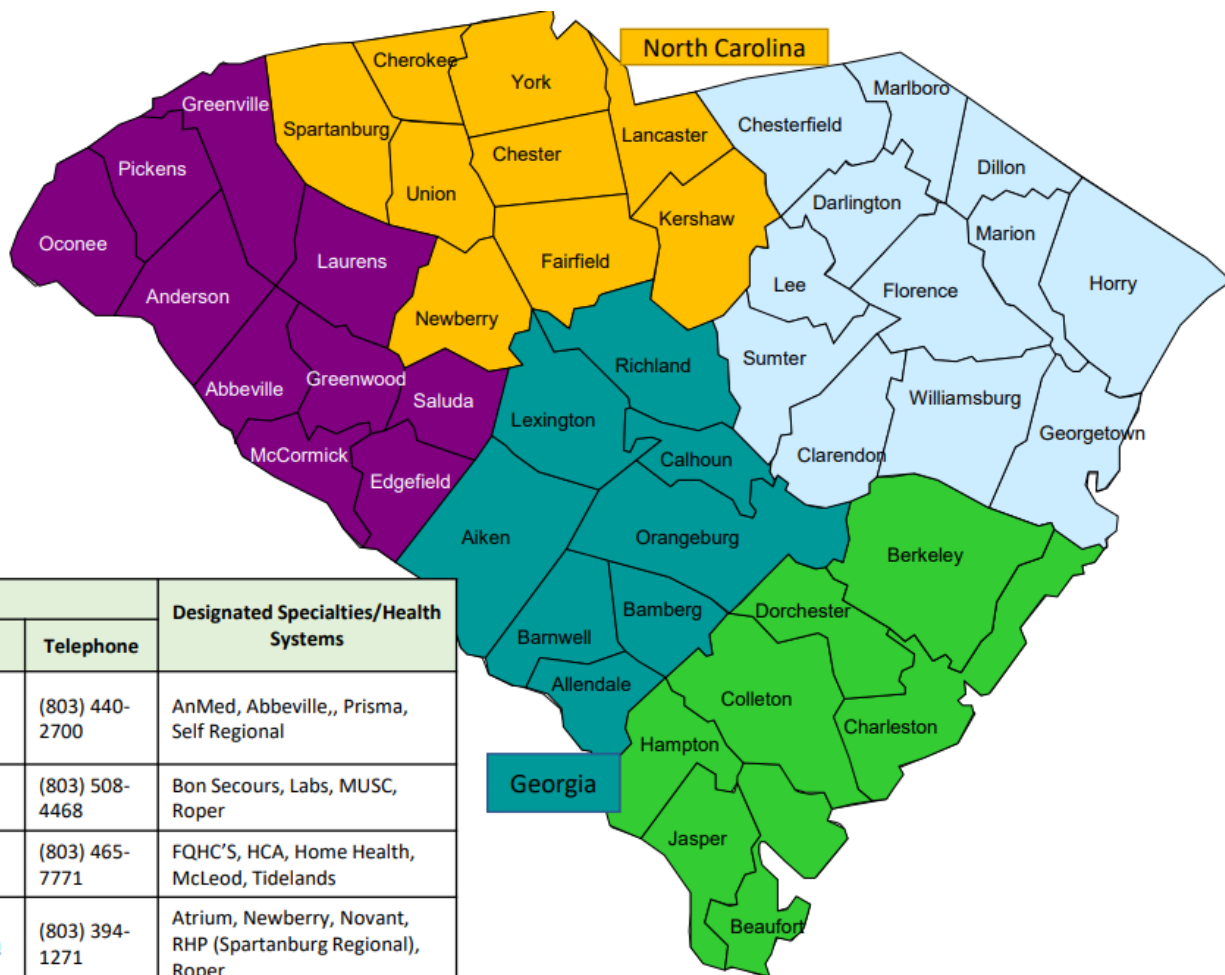
# Molina of South Carolina Provider Relations Contact Information

Molina has designated email addresses based on provider types to help get your questions answered more efficiently or to connect you to training opportunities:

## Molina Healthcare of South Carolina

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# Thank You



Questions



Open  
Discussion

