



2026 ANNUAL VOLUNTEER TRAINING

This document contains the required
2026 Training Materials.

More than a Meal

For optimal readability, please review all materials on a desktop/laptop computer or tablet. You may print the materials if preferred, but videos must be viewed online. Avoid using a smartphone, as it can make reading difficult.

After you have read the entire document and reviewed the videos, please visit mobilemeals.org/trainingform to complete a short quiz and fill out the **Training Acknowledgment Form**.

**Please complete this training no later than
February 28, 2026**





January 2026

Dear Valued Volunteer,

All Mobile Meals of Toledo volunteers are required to complete annual training in partnership with the **Area Office on Aging of Northwest Ohio**. This training is designed to support your growth in volunteerism, technology, and logistics, while ensuring compliance with annual standards for fraud prevention, ethics, and client health & well-being.

Please review the following sections and watch the videos (links provided) at your own pace. Once you have finished, you will be asked to update your contact information, complete a brief retention quiz, and confirm completion. Your participation helps keep Mobile Meals in compliance with our partner agencies and supports operational efficiency by increasing awareness and reducing errors.

If you have any questions about the training content, please contact me. I am happy to assist you in any way I can.

Sincerely,

Matthew Leuck
Volunteer Manager

Mobile Meals of Toledo, Inc.
Direct Line: 419-255-6619
Text Only: 419-280-3236
mleuck@mobilemeals.org

Section 1:

Tips For Being an Outstanding Mobile Meals Volunteer



Volunteering with Mobile Meals of Toledo is a rewarding journey. Not only are you assisting those in need, but you are also enriching your own life. Whether you are delivering meals, assisting in the kitchen, or helping with administrative tasks, your contribution has a profound impact. Here are tips to help you shine as a volunteer.

Understand the Mission

Before starting your volunteer work, take time to understand Mobile Meals of Toledo's mission. Read up on the organization's goals and the communities it serves. Understanding the challenges faced by those in need can inspire you to engage deeply with the mission. You can learn more about our organization at mobilemeals.org.

Be Reliable and Punctual

Reliability is crucial in any volunteer role. If you commit to a shift or task, ensure that you arrive on time and fulfill your responsibilities. If something comes up, communicate with your coordinator right away. Remember, your fellow volunteers and clients rely on your commitment. In fact, a recent survey indicated that 90% of volunteers feel their reliability directly influences the organization's efficiency.

Communicate Effectively

Good communication is key in any volunteer environment. Whether you are interacting with fellow volunteers, staff, or clients, clear and respectful communication makes a difference. If you have questions or concerns, feel free to speak up. Open dialogue creates a positive atmosphere for everyone involved.

Be Compassionate and Respectful

While delivering meals or interacting with clients, approach each situation with kindness and respect. Many recipients may be facing challenging circumstances. A simple smile or warm greeting can brighten their day. Treat each client with dignity; your kindness can leave a lasting impression during their time of need.

Be Open to Learning

Every volunteer experience offers a chance to learn. Be open to feedback and ready to adapt to new situations. You could improve your skills in areas like dietary restrictions, food safety protocols, or even your delivery routes. Adapting can make you a more versatile and effective volunteer.

Build Relationships

Volunteering is as much about connections as it is about tasks. Take time to get to know your fellow volunteers and clients. Building relationships fosters a supportive community and enhances your overall experience. Joining group activities or outings organized by Mobile Meals can help to strengthen these bonds.

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Take Care of Yourself

Volunteering can be physically and emotionally demanding. To give your best, prioritize self-care. Stay hydrated, eat nutritious meals, and ensure you get enough rest. If you feel overwhelmed, do not hesitate to take a step back. Remember, you cannot help others if you do not look after yourself.

Be Flexible

Flexibility is a valuable trait in volunteering. Plans may change, and unexpected situations may arise; being adaptable will help you navigate these challenges. Whether it involves adjusting your schedule or stepping into a different role, maintaining a positive attitude will help you cope with surprises.

Share Your Experience

After volunteering, share your story with others. Use social media, community events, or casual conversations to highlight Mobile Meals of Toledo's impact. Sharing your journey might inspire others to get involved. Your story can showcase the importance of the work being done and encourage more community members to join the cause.

Stay Informed

Keep up with the latest news and updates from Mobile Meals of Toledo. Read newsletters, attend meetings, and engage in training sessions. Being informed will help you understand the organization's needs and how you can contribute more effectively.

Celebrate Your Impact

Take time to reflect on the difference you are making through your volunteer efforts. Celebrate small victories, from a successful meal delivery to a meaningful interaction with a client. Recognizing your contributions not only boosts your morale but can also motivate others to follow your example.

Embrace the Experience

Volunteering with Mobile Meals of Toledo is a fulfilling way to positively impact the community. By adopting these tips, you can enhance your experience and stand out as an outstanding volunteer. Remember, your dedication and compassion are crucial to making a real difference in the lives of those you serve. Enjoy the journey of making a positive impact in your community, and feel proud of your contributions.

By committing to these principles, you enrich your own volunteering experience and contribute to the success of Mobile Meals of Toledo. Together, we can build a stronger, more supportive community for all.

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Please select the link below to watch a video on volunteerism.

How One Volunteer Built Decades of Connections (1 minute)



CLICK HERE TO WATCH THE VIDEO

or visit: mobilemeals.org/2026-training

Section 2: Email Best Practices

Keeping your email in-box clean and properly set-up is essential for staying connected with Mobile Meals of Toledo. Missing important messages contributes to vacant delivery routes, missed volunteer shifts, and overlooked operational updates. These issues ultimately affect the quality of service our clients receive.

A well-maintained inbox ensures you receive all critical communication from the Volunteer Manager and helps reduce unnecessary junk email (spam). Please go through the following checklist and follow its recommendations. Investing a few minutes now will make communication more streamlined not only with Mobile Meals, but across all your email interactions.

Email Checklist for Mobile Meals Volunteers

Follow these simple steps to ensure you receive important Mobile Meals messages about routes, schedules, and updates.

Step 1: ADD MOBILE MEALS TO YOUR CONTACTS (MOST IMPORTANT)

Add these senders to your email contacts or address book:

- Matthew Leuck mleuck@mobilemeals.org
- Any Mobile Meals emails sent through Network for Good (mail@networkforgood.com)

Saving a sender tells your email system the messages are trusted and wanted.

Step 2: OPEN AND READ MOBILE MEALS EMAILS

When you receive a Mobile Meals email:

- Open the message
- Scroll through it
- Click a link if one is included

Email systems pay attention to what you open and interact with.

Step 3: DO NOT MARK EMAILS FROM MOBILE MEALS AS SPAM

- Spam/Junk = “This sender is suspicious”
- Unsubscribe = “I don’t want these emails anymore”

If you want fewer emails or have questions, please contact the Mobile Meals office instead of marking messages as spam.

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Step 4: WATCH FOR EMAILS THAT LOOK DIFFERENT

Some Mobile Meals emails are sent through Network for Good, our fundraising platform.

They may look different, but they are still legitimate. Add those senders to your contacts as well.

If a Mobile Meals Email Goes to Spam

1. Open your Spam or Junk folder
2. Find the Mobile Meals or Network for Good email
3. Choose “Not Spam” or “Move to Inbox”
4. Add the sender to your contacts

This retrains your email system so future messages arrive correctly.

If You Think You Didn’t Get an Email

- Search your inbox for “Mobile Meals”
- Check folders such as Spam, Junk, Promotions, Updates, or Other

Some email systems automatically sort messages into separate folders.

General Email Tips (Helpful for Everyone)

- Unsubscribe from newsletters you no longer read
- Delete or archive old messages you no longer need
- Use folders or labels to organize important emails
- Avoid clicking links or attachments from unknown senders
- Keep your inbox manageable so important messages stand out

Please Avoid

-  Blocking Mobile Meals emails
-  Repeatedly deleting our emails without opening them
-  Marking legitimate Mobile Meals emails as spam

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Our Commitment

Mobile Meals does not sell or share your email address. We send emails only when necessary to support your volunteer service. If you ever have questions or want fewer emails, please contact the Mobile Meals office.

Since implementing these guidelines can vary depending on your email app, please reach out to the Volunteer Manager for assistance. Thank you for helping keep communication clear and reliable.

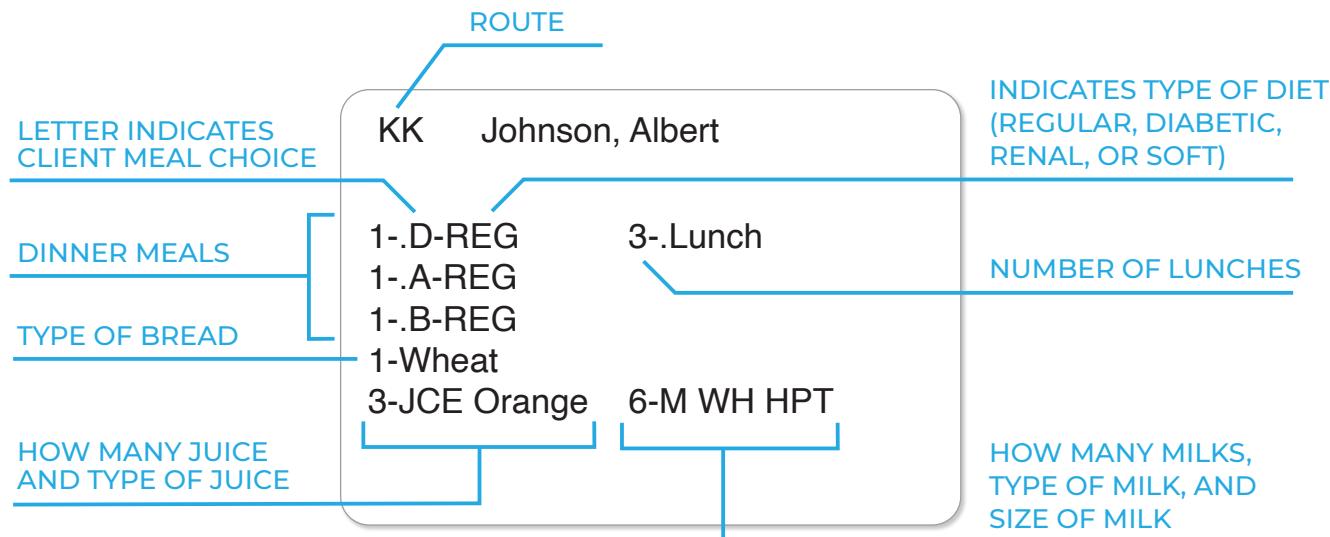
Section 3: What's In My Bag?

It is essential for all volunteers that deliver meals to understand what should be included in the meal bags. Understanding how to read the labels on your route's bags can help avoid mistakes during delivery, such as delivering to the wrong client or delivering the wrong number of bags. Each bag is labeled to indicate the name of the client, its contents, and also specifies whether the client is receiving one or two bags. The sample below for a Tuesday delivery demonstrates how to read the label, allowing you to confirm the contents of the bag if needed.

SAMPLE TUESDAY DELIVERY LABEL

2 MEALS PER DAY

CONTAINS FOOD FOR: TUESDAY, WEDNESDAY, THURSDAY



THIS LABEL INDICATES:



This client's delivery will also include Fruit (3), Cereal/Bread Products (3), and Packaged Treats (2), which are not indicated on the label. This Tuesday delivery requires two large bags and will have the same label, hand-marked with a "1" and a "2".

All labels, regardless of delivery day, are formatted consistently. However, the information shown on each label may vary based on the delivery day, meal count, and client preferences.

Section 4: Delivery Checklist

Accurately matching and giving out meals equals happy and well-fed clients who eat their meals on time to take their medications. Clients may have dietary restrictions indicated on the meal label.

AT THE PICK-UP SITE:

#1

GO SLOW AND REVIEW THE ROUTE thoroughly by matching the clients to the route list. Check your ROUTE CODE on the top left corner of the meal label to ensure you only have bags for your route.

#2

If you are MISSING something after checking your bags, ASK THE DRIVER. If the driver is unable to help, call 419.255.6619.

#3

Client bags with a #1 or #2 printed on them have a TWO-BAG DELIVERY. Make sure that you have BOTH of them. *Tip: Load the meals in reverse order so the first client's bag will be at your fingertips.*

#4

IF YOU CONFIRMED BOXES #1 - #3 ABOVE, proceed to the route.

In the warmer months, run the air conditioning to keep the meals at a safe temperature. In colder months, load the meals in your trunk.

WHILE DELIVERING:

If you have a few minutes, stay and chat. It will go a long way to brighten their day.

Please read all delivery instructions before leaving bags and report to us any clients you did not see in the Driver Comments section.

If the Driver Instructions ask you to offer assistance or remain until the client answers the door but doesn't respond, call one of the office numbers below before leaving their residence.

Please sign legibly before exiting the Mobile Meals (ServTracker) App while still at your last stop.

IF YOU CANNOT CONFIRM ALL THE STEPS outlined on this sheet or need clarification, PLEASE ASK A DRIVER FOR HELP or CALL THE OFFICE at 419.255.6619 or 419.255.7806.

WHAT TO DO IF YOU DELIVER THE WRONG BAG TO A CLIENT OR FORGET A BAG?

Please ensure that the client receives the correct bags. Contact the office immediately if you accidentally deliver the wrong bags or forget any. Mobile Meals will contact the client so you can return to deliver any missed items or switch the bags.

If it's NOT possible to correct the delivery right away, the kitchen will assemble new bags and arrange for someone to deliver them to the client later in the day. When this happens, it is generally inconvenient for the client and incurs additional costs for Mobile Meals. Thank you for your attention to this matter.



MOBILE MEALS HANDY INFORMATION

PICK-UP SITE INFORMATION

Toledo Ice House

Pick up meals between 9:00 am and 10:30 am, return tablet by 11:30 am. The Tablets can also be returned by 2:00 pm at the St. Anne Mobile Meals site

Great Lakes Sound

Pick up meals from the walk-in cooler between 10:00 am and 11:00 am, return tablet by 1:00 pm

St. Anne

Pick up meals between 11:30 am and 12:30 pm, return tablet by 2:00 pm

St. Charles

Pick up meals between 9:00 am and 10:00 am, return tablet by 12:30 pm

St. Luke

Pick up meals between 10:00 am and 11:00 am, return tablet by 1:00 pm

HANDLING EMERGENCIES

It is possible that you may encounter an emergency situation while delivering meals.

1. Provide comfort and **IMMEDIATELY CALL 911** in an emergency situation, but do not attempt to move or treat a client when you find them in distress.
2. Call our office to notify us of the situation: 419-255-6619. Refer to the **Change of Condition** form (keep handy in your vehicle for reference).
3. Keep calm and monitor the client until emergency personnel arrive.
4. Remaining clients on your route will be informed that there will be a delay in receiving their meals.

Section 5: Making Successful Client Deliveries

Delivering Mobile Meals is more than just dropping off food; it's about making meaningful connections and supporting the health and well-being of seniors in your community. Whether you're a new or seasoned volunteer, here are some key tips and things to be mindful of during your deliveries.

1. Be Consistent and Timely

Your reliability means a lot to seniors who count on their daily meals. Stick to your scheduled route and arrive at roughly the same time each day. This routine provides comfort and helps clients plan their day.

2. Practice Friendly Communication

A warm greeting and a smile can make a world of difference. For many seniors, you might be their only visitor for the day. Take a moment to chat and brighten their mood—sometimes, your visit is as nourishing as the meal itself.

3. Respect Privacy and Personal Boundaries

Always respect the seniors' space and wishes. Some may want to talk, while others prefer a quick drop-off. Please pay attention to their cues and never enter their home unless specifically invited.

4. Observe Living Conditions

Monitor any changes in the seniors' living conditions. Signs such as accumulated mail, spoiled food, or unsafe conditions (tripping hazards, no heat, etc.) may indicate they need additional assistance. Report any concerns to the Volunteer Manager.

5. Monitor Physical and Emotional Well-being

Notice any changes in the senior's appearance or demeanor, such as confusion, bruises, or withdrawal. These may indicate declining health or other issues. Always communicate concerns in the "Change of Condition" after tapping the "Delivered" button.

6. Practice Food Safety

Ensure meals are delivered promptly and stored appropriately if the recipient isn't ready to eat. Remind them about refrigeration or reheating instructions when needed.

7. Stay Flexible and Patient

Seniors may take longer to reach the door or have special requests. Be patient and accommodating whenever possible, and maintain a positive attitude.

8. Maintain Confidentiality

Respect the privacy of the seniors you serve. Don't share their personal information or details about their situation with others.

Mobile Meals volunteers are the eyes, ears, and hearts of the program. By following these tips, you not only nourish bodies but also foster safety, dignity, and connection for seniors in your community.

CONTINUED

Please select the link below to watch a video on volunteer deliveries.

Volunteer Training Video (2.5 minutes)



CLICK HERE TO WATCH THE VIDEO

or visit: mobilemeals.org/2026-training



Section 6: Change Of Condition Chart

Physical & Mental Health	Self-Care & Safety	Mobility	Nutrition	Home Environment	Social & Community	Emergency
Unusual Breathing	Disheveled Appearance	Starts or Stops Using Walker/Cane/ Wheelchair	Noticeable Weight Gain/Loss	Dirtier Than Usual/ Clutter/Hoarding	No Longer Goes to a Senior Center	Immediate Injury
New Cuts or Bruises	Unkempt Hair or Nails	Answers Door Faster than Before	Abundance of Meals or Milk	Heating/Cooling Problem	Change in Family Support/Caregiver	Concerning Illness
Apparent Change in Mood or Behavior	Suspected Signs of Neglect or Abuse	Taking Longer than Usual to Answer the Door	Dental Problem/ Trouble Chewing or Swallowing	Difficulties Managing Home/Yard Broken Lock	Reported Loss of Family Member, Friend, or Pet	Unconscious Upon Arrival/Becomes Unconscious
Confusion	Body Odor	New Limp	Dehydration		New Aide	Eviction
Muscle Weakness	Bathing More Regularly	Decreased Mobility	Decrease or Increased Appetite	Unsafe Electrical or Gas Appliances (Gas Odor)	Started Attending Church Regularly	FIRST, CALL 911 WHEN WARRANTED
Fatigue	Tidy Appearance	Unsteady	Finishing Meals	Trip Hazards	Garden Club	NEXT, NOTIFY MOBILE MEALS
Facial Droop	Medication Theft	Can No Longer Answer the Door	Bare Cupboards	Tidy/Clean Home	Family Moved In	Main Office: 419-255-7806
Skin Discoloration (Yellow, Blue, etc.)	Not Taking Medications		Ill-fitting or Lost Dentures	New Ramp/Railing Installed	Started Playing Bingo on Tuesdays	Volunteer Manager: 419-255-6619
				Pest Control Needed		Client Representative: 419-255-6111

Section 7: Volunteering at Events and Social Media Advocacy



Volunteering at Special Events – We Need You!

Volunteers are essential for the success of our fundraising events. We particularly need assistance for two annual events: Pies & Pints and Sip, Sip HOORAY! There are various roles available, including selling tickets, pouring drinks, managing auction tables, and helping with setup. We truly appreciate your time and hope you can lend a hand.

If you're interested in volunteering for events, please visit mobilemeals.org/contact-volunteering and complete the Volunteer Interest Form. A job description for volunteering at special events is also available to download from this page. For any questions, contact Jennifer Ziolkowski, Development & Events Manager, at jziolkowski@mobilemeals.org.

Be Our Social Media Advocate

If you have a social media account like Facebook or Instagram you can become a **Mobile Meals Social Media Advocate**. To become an effective advocate, you must take a proactive and engaging approach across your social media platforms. Start by regularly sharing our official content, such as posts, images, and videos, highlighting our mission, the services we provide, and our impact on the community.

Promote upcoming events by creating or sharing posts that inform your family and friends and inspire them to participate.

Encourage your friends, family, and followers to support Mobile Meals by emphasizing the importance of donations and volunteer work. Share personal stories or testimonials about your experiences with Mobile Meals to create a deeper connection and foster a sense of community.

Lastly, ensure that the voice you maintain on your personal social media accounts is consistent with Mobile Meals' values. Be authentic in your posts and interactions, as this sincerity will resonate with your friends and family and motivate them to act in support of our cause. Remember, your unique perspective can be a powerful tool for advocacy.

If you have any questions, please reach out to Charles at clinden@mobilemeals.org.

Section 8: Combating Medicare Parts C and D Fraud, Waste, and Abuse Training Course

ACRONYMS

The following acronyms are used throughout the course.

CFR	Code of Federal Regulations
CMS	Centers for Medicare & Medicaid Services
EPLS	Excluded Parties List System
FCA	False Claims Act
FDRs	First-tier, Downstream, and Related Entities
FWA	Fraud, Waste, and Abuse
HIPAA	Health Insurance Portability and Accountability Act
LEIE	List of Excluded Individuals and Entities
MA	Medicare Advantage
MAC	Medicare Administrative Contractor
MLN	Medicare Learning Network®

This training assists Medicare Parts C and D plan Sponsors' employees, governing body members, and their first-tier, downstream, and related entities (FDRs) to satisfy their annual fraud, waste, and abuse (FWA) training requirements in the regulations and sub-regulatory guidance at:

- 42 Code of Federal Regulations (CFR) Section 422.503(b)(4)(vi)(C)
- 42 CFR Section 423.504(b)(4)(vi)(C)
- CMS-4182-F, Medicare Program; Contract Year 2019 Policy and Technical Changes to the Medicare Advantage and the Medicare Prescription Drug Benefit Programs
- Section 50.3.2 of the Compliance Program Guidelines (Chapter 9 of the Medicare Prescription Drug Benefit Manual and Chapter 21 of the Medicare Managed Care Manual)

Why Do I Need Training?

Every year billions of dollars are improperly spent because of FWA. It affects everyone—including you. This training will help you detect, correct, and prevent FWA. You are part of the solution.

Combating FWA is everyone's responsibility! As an individual who provides health or administrative services for Medicare enrollees, every action you take potentially affects Medicare enrollees, the Medicare Program, or the Medicare Trust Fund.

Training Requirements: Plan Employees, Governing Body Members, and First-Tier, Downstream, or Related Entity (FDR) Employees & Volunteers

Certain training requirements apply to people involved in Medicare Parts C and D. All employees of Medicare Advantage Organizations (MAOs) and Prescription Drug Plans (PDPs) (collectively referred to in this course as "Sponsors") must receive training for preventing, detecting, and correcting FWA. FWA training must occur within 90 days of initial hire and at least annually thereafter. More

information on other Medicare Parts C and D compliance trainings and answers to common questions is available on the CMS website.

LESSON 1: WHAT IS FWA?

Introduction and Learning Objectives

This lesson describes fraud, waste, and abuse (FWA) and the laws that prohibit it. Upon completing the lesson, you should be able to correctly:

- Recognize FWA in the Medicare Program
- Identify the major laws and regulations pertaining to FWA
- Recognize potential consequences and penalties associated with violations

Fraud

Fraud is knowingly and willfully executing, or attempting to execute, a scheme or artifice to defraud any health care benefit program or to obtain, by means of false or fraudulent pretenses, representations, or promises, any of the money or property owned by, or under the custody or control of, any health care benefit program.

The Health Care Fraud Statute makes it a criminal offense to knowingly and willfully execute a scheme to defraud a health care benefit program. Health care fraud is punishable by imprisonment up to 10 years. It is also subject to criminal fines up to \$250,000.

Waste and Abuse

Waste includes practices that, directly or indirectly, result in unnecessary costs to the Medicare Program, such as overusing services. Waste is generally not considered to be caused by criminally negligent actions but rather by the misuse of resources.

For the definitions of fraud, waste, and abuse, refer to Section 20, Chapter 21 of the Medicare Managed Care Manual and Chapter 9 of the Prescription Drug Benefit Manual on the Centers for Medicare & Medicaid Services (CMS) website.

Abuse includes actions that may, directly or indirectly, result in unnecessary costs to the Medicare Program. Abuse involves paying for items or services when there is no legal entitlement to that payment, and the provider has not knowingly or intentionally misrepresented facts to obtain payment.

Examples of FWA

Examples of actions that may constitute Medicare fraud include:

- Knowingly billing for services or supplies not provided, including billing Medicare for appointments the patient failed to keep
- Billing for nonexistent prescriptions
- Knowingly altering claim forms, medical records, or receipts to receive a higher payment

Examples of actions that may constitute Medicare waste include:

- Conducting excessive office visits or writing excessive prescriptions
- Prescribing more medications than necessary for treating a specific condition
- Ordering excessive laboratory tests

Examples of actions that may constitute Medicare abuse include:

- Unknowingly billing for unnecessary medical services
- Unknowingly billing for brand name drugs when generics are dispensed
- Unknowingly excessively charging for services or supplies
- Unknowingly misusing codes on a claim, such as upcoding or unbundling codes

Differences Among Fraud, Waste, and Abuse

There are differences among fraud, waste, and abuse. One of the primary differences is intent and knowledge. Fraud requires intent to obtain payment and the knowledge the actions are wrong. Waste and abuse may involve obtaining an improper payment or creating an unnecessary cost to the Medicare Program but do not require the same intent and knowledge.

Understanding FWA

To detect FWA, you need to know the law.

The following information provides high-level information about the following laws:

- Civil False Claims Act, Health Care Fraud Statute, and Criminal Fraud
- Anti-Kickback Statute
- Exclusion from all Federal health care programs
- Health Insurance Portability and Accountability Act (HIPAA)

For details about specific laws, such as safe harbor provisions, consult the applicable statute and regulations.

Civil False Claims Act (FCA)

The civil provisions of the FCA make a person liable to pay damages to the Government if he or she knowingly:

- Conspires to violate the FCA
- Carries out other acts to obtain property from the Government by misrepresentation
- Conceals or improperly avoids or decreases an obligation to pay the Government
- Makes or uses a false record or statement supporting a false claim
- Presents a false claim for payment or approval

For more information, refer to 31 United States Code (USC) Sections 3729–3733.

EXAMPLES

A Medicare Part C plan in Florida:

- Hired an outside company to review medical records to find additional diagnosis codes it could submit to increase risk capitation payments from CMS
- Was informed by the outside company that certain diagnosis codes previously submitted to Medicare were undocumented or unsupported
- Failed to report the unsupported diagnosis codes to Medicare
- Agreed to pay \$22.6 million to settle FCA allegations

The owner-operator of a medical clinic in California:

- Used marketers to recruit individuals for medically unnecessary office visits
- Promised free, medically unnecessary equipment or free food to entice individuals
- Charged Medicare more than \$1.7 million for the scheme
- Was sentenced to 37 months in prison

Whistleblowers

A whistleblower is a person who exposes information or activity that is deemed illegal, dishonest, or violates professional or clinical standards.

Protected: Persons who report false claims or bring legal actions to recover money paid on false claims are protected from retaliation.

Rewarded: Persons who bring a successful whistleblower lawsuit receive at least 15 percent, but not more than 30 percent, of the money collected.

Health Care Fraud Statute

The Health Care Fraud Statute states, "Whoever knowingly and willfully executes, or attempts to execute, a scheme or artifice to defraud any health care benefit program ... shall be fined under this title or imprisoned not more than 10 years, or both."

Conviction under the statute does not require proof the violator had knowledge of the law or specific intent to violate the law. For more information, refer to 18 USC Sections 1346–1347.

EXAMPLES

A Pennsylvania pharmacist:

- Submitted claims to a Medicare Part D plan for non-existent prescriptions and drugs not dispensed
- Pleaded guilty to health care fraud
- Received a 15-month prison sentence and was ordered to pay more than \$166,000 in restitution to the plan

The owner of multiple Durable Medical Equipment (DME) companies in New York:

- Falsely represented themselves as one of a nonprofit health maintenance organization's (that administered a Medicare Advantage plan) authorized vendors
- Provided no DME to any beneficiaries as claimed
- Submitted almost \$1 million in false claims to the nonprofit; \$300,000 was paid
- Pleaded guilty to one count of conspiracy to commit health care fraud

Criminal Health Care Fraud

Persons who knowingly make a false claim may be subject to:

- Criminal fines up to \$250,000
- Imprisonment for up to 20 years

If the violations resulted in death, the individual may be imprisoned for any term of years or for life.

Anti-Kickback Statute

The Anti-Kickback Statute prohibits knowingly and willfully soliciting, receiving, offering, or paying remuneration (including any kickback, bribe, or rebate) for referrals for services that are paid, in whole or in part, under a Federal health care program including the Medicare Program.)

EXAMPLE

From 2012 through 2015, a physician operating a pain management practice in Rhode Island:

- Conspired to solicit and receive kickbacks for prescribing a highly addictive version of the opioid Fentanyl
- Reported patients had breakthrough cancer pain to secure insurance payments
- Received \$188,000 in speaker fee kickbacks from the drug manufacturer
- Admitted the kickback scheme cost Medicare and other payers more than \$750,000

The physician must pay more than \$750,000 restitution and is awaiting sentencing.

Civil Monetary Penalties (CMP) Law

The Office of Inspector General (OIG) may impose civil penalties for several reasons, including:

- Arranging for services or items from an excluded individual or entity
- Providing services or items while excluded
- Failing to grant OIG timely access to records
- Knowing of and failing to report and return an overpayment
- Making false claims
- Paying to influence referrals

Exclusion

No Federal health care program payment may be made for any item or service furnished, ordered, or prescribed by an individual or entity excluded by the OIG. The OIG has authority to exclude individuals and entities from federally funded health care programs and maintains the List of Excluded Individuals and Entities (LEIE).

EXAMPLE

A pharmaceutical company pleaded guilty to two felony counts of criminal fraud related to failure to file required reports with the U.S. Food and Drug Administration concerning oversized morphine sulfate tablets. The pharmaceutical firm executive was excluded based on the company's guilty plea. At the time the unconvicted executive was excluded, there was evidence he was involved in misconduct leading to the company's conviction.

Health Insurance Portability and Accountability Act (HIPAA)

HIPAA created greater access to health care insurance, strengthened the protection of privacy of health care data, and promoted standardization and efficiency in the health care industry. HIPAA safeguards deter unauthorized access to protected health care information. As an individual with access to protected health care information, you must comply with HIPAA.

LESSON 2: YOUR ROLE IN THE FIGHT AGAINST FWA

Introduction and Learning Objectives

This lesson explains the role you can play in fighting against fraud, waste, and abuse (FWA), including your responsibilities for preventing, reporting, and correcting FWA. Upon completing the lesson, you should correctly:

- Identify methods of preventing FWA
- Identify how to report FWA
- Recognize how to correct FWA

Where Do I Fit In?

As a person providing health or administrative services to a Medicare Part C or Part D enrollee, you are likely an employee (or volunteer) of a:

- Sponsor (Medicare Advantage Organization [MAO] or a Prescription Drug Plan [PDP])
- First-tier entity (Examples: Pharmacy Benefit Management [PBM]; hospital or health care facility; provider group; doctor's office; clinical laboratory; customer service provider; claims processing and adjudication company; a company that handles enrollment, dis-enrollment, and membership functions; and contracted sales agents)
- Downstream entity (Examples: pharmacies, doctor's office, firms providing agent/broker services, marketing firms, and call centers)
- Related entity (Examples: Entity with common ownership or control of a Sponsor, health promotion provider, or SilverSneakers®)

What Are Your Responsibilities?

You play a vital part in preventing, detecting, and reporting potential FWA, as well as Medicare noncompliance.

- FIRST, you must comply with all applicable statutory, regulatory, and other Medicare Part C or Part D requirements, including adopting and using an effective compliance program.
- SECOND, you have a duty to the Medicare Program to report any compliance concerns and suspected or actual violations of which you may be aware.
- THIRD, you have a duty to follow your organization's Code of Conduct that articulates your and your organization's commitment to standards of conduct and ethical rules of behavior.

How Do You Prevent FWA?

- Look for suspicious activity
- Conduct yourself in an ethical manner
- Ensure accurate and timely data and billing
- Ensure coordination with other payers
- Know FWA policies and procedures, standards of conduct, laws, regulations, and CMS' guidance
- Verify all received information

Stay Informed About Policies and Procedures

Know your entity's policies and procedures. Every Sponsor and First-Tier, Downstream, and Related Entity (FDR) must have policies and procedures that address FWA. These procedures should help you detect, prevent, report, and correct FWA.

Standards of Conduct should describe the Sponsor's expectations that:

- All employees (and volunteers) conduct themselves in an ethical manner
- Appropriate mechanisms are in place for anyone to report noncompliance and potential FWA
- Reported issues will be addressed and corrected

Standards of Conduct communicate to employees and FDRs compliance is everyone's responsibility, from the top of the organization to the bottom.

Report FWA

Everyone must report suspected instances of FWA. Your Sponsor's Code of Conduct should clearly state this obligation. Sponsors may not retaliate against you for making a good faith effort in reporting. Report any potential FWA concerns you have to Mobile Meals' compliance department or your Sponsor's compliance department. Your Sponsor's compliance department will investigate and make the proper determination. Often, Sponsors have a Special Investigations Unit (SIU) dedicated to investigating FWA. They may also maintain an FWA Hotline.

Correction

Once fraud, waste, or abuse is detected, promptly correct it. Correcting the problem saves the Government money and ensures your compliance with CMS requirements.

Develop a plan to correct the issue. Ask your organization's compliance officer about the development process for the corrective action plan. The actual plan is going to vary, depending on the specific circumstances. In general:

- Design the corrective action to correct the underlying problem that results in FWA program violations and to prevent future noncompliance.
- Tailor the corrective action to address the particular FWA, problem, or deficiency identified. Include time frames for specific actions.
- Document corrective actions addressing noncompliance or FWA committed by a Sponsor's employee or FDR's employee, and include consequences for failure to satisfactorily complete the corrective action.
- Monitor corrective actions continuously to ensure effectiveness.

Corrective Action Examples

Corrective actions may include:

- Adopting new prepayment edits or document review requirements
- Conducting mandated training
- Providing educational materials
- Revising policies or procedures
- Sending warning letters
- Taking disciplinary action, such as suspension of marketing, enrollment, or payment
- Terminating an employee or provider

Section 9: Passport Code of Ethics

PASSPORT, Assisted Living and Individual Provider Code of Ethics

Requirements for providers to become, and to remain, certified

PASSPORT All Providers 173-39-02 (B)(8)(a) through (n), and

Agency providers (C)(1)(d), and Assisted Living providers(C)(4)(e)(i) – effective 10/7/25

Ethical, professional, respectful, and legal service standards: The provider shall not engage in any unethical, unprofessional, disrespectful, or illegal behavior including the following:

- Consuming alcohol while providing services to the individual.
- Consuming medicine, drugs or other chemical substances in a way that is illegal, unprescribed, or impairs the provider from providing services to the individual.
- Accepting, obtaining or attempting to obtain money or anything of value, including gifts or tips, from the individual or his or her household or family members.
- Engaging the individual in sexual conduct, or in conduct a reasonable person would interpret as sexual in nature, even if the conduct is consensual.
- Leaving the individual's home when scheduled to provide a service for a purpose not related to providing the service without notifying the agency supervisor, the individual's emergency contact person, any identified caregiver, or the individual's case manager.
- **Failing to cooperate with or treating ODA or its designee (Case Manager, Reviewer) respectfully.**
- Engaging in any activity while providing a service that may distract the provider from providing the **service as authorized**, including the following:
 - Watching television, movies, videos, or playing games on computers, personal phones, or other electronic devices whether owned by the individual, provider, or the provider's staff.
 - Non-care related socialization with a person other than the individual (e.g., a visit from a person who is not providing care to the individual; making or receiving a personal telephone call; or, sending or receiving a personal text message, email or video.)
 - Providing care to a person other than the individual.
 - Smoking tobacco or any other material in any type or smoking equipment, including cigarettes, electronic cigarettes, vaporizers, hookahs, cigars, or pipes.
 - Sleeping.
 - Bringing a child, friend, relative, or anyone else, or a pet to the individual's place of residence.
 - Discussing religion or politics with the individual and others.
 - Discussing personal issues with the individual or any other person.
- Engaging in behavior that causes or may cause physical, verbal, mental or emotional distress or abuse to the individual, including publishing photos of the individual on social media without the individual's written consent.
- Engaging in behavior a reasonable person would interpret as inappropriate involvement in the individual's personal relationships.

CONTINUED NEXT PAGE

- Making decisions, or being designated to make decisions, for the individual in any capacity involving a declaration for mental health treatment, power of attorney, durable power of attorney, guardianship or authorized representative, unless otherwise permitted under rule 5168-44-32 Administrative Code.
- Selling to, or purchasing from, the individual products or personal items, unless the provider is the individual's family member who does so only when not providing services.
- Consuming the individual's food or drink, or using the individual's personal property without his or her consent.
- Taking the individual to the provider's business site, unless the business site is an ADS center, RCF, or (if the provider is a participant-directed provider) the individual's home.
- Engaging in behavior constituting a conflict of interest, or taking advantage of, or manipulating services resulting in an unintended advantage for personal gain that has detrimental results to the individual, the individual's family or caregivers, or another provider.

PASSPORT Updated 10-7-25

**AFTER READING ALL 9 SECTIONS,
CLICK HERE TO COMPLETE THE TRAINING**
or visit: mobilemeals.org/trainingform

**Please contact Matthew Leuck, Volunteer Manager, with any questions
or concerns regarding the information in this document.
mleuck@mobilemeals.org • 419-255-6619**