



GetCoveredIllinois[®]
The Official Health Marketplace

FRAUD, WASTE, AND ABUSE POLICY

Table of Contents

Purpose	2
Applicability and Scope	2
Definitions	2
Policy Statement.....	2
Prevention of Fraud, Waste, and Abuse.....	3
Consumer Awareness and Safeguards.....	3
Internal Controls.....	3
Risk Assessments.....	4
Training.....	4
Ethical Culture.....	4
Fraud, Waste, and Abuse Detection and Monitoring	4
Ongoing Monitoring.....	4
Audits.....	4
Data Analytics.....	4
Reporting Mechanisms for Fraud, Waste, and Abuse Complaints	5
Internal Reporting.....	5
External Reporting	5
Whistleblower Protections	6
Types of Reportable Violations.....	6
Investigation and Resolution	6
Confidentiality and Protection	6
Training and Awareness.....	7
Legal References and Guidance	7
Review and Updates.....	7

Purpose

This policy establishes the framework for identifying, preventing, detecting, and reporting fraud, waste, and abuse (FWA) within Get Covered Illinois (GCI), Illinois's State-Based Health Insurance Marketplace. GCI's objective is to foster a culture of integrity and accountability, protect GCI assets, and comply with federal and state laws and regulations.

Applicability and Scope

This policy applies to all GCI staff, including full- and part-time employees, contractors, vendors, consultants, navigators, assisters, and any other individuals performing services on behalf of GCI. This policy also applies to third-party entities engaged in outreach, enrollment, call center operations, systems development, and appeals management.

All GCI-affiliated individuals are responsible for understanding and complying with this policy and reporting suspected or actual instances of FWA.

Definitions

In alignment with the U.S. Department of Health and Human Services Office of Inspector General:

- **Fraud:** An intentional deception or misrepresentation made by a person or entity, knowing it is false, that could result in unauthorized benefit. Examples: knowingly falsifying eligibility, enrolling ghost consumers, kickbacks, and falsified records.
- **Waste:** The careless or unnecessary expenditure or mismanagement of state or federal resources, even if not intentional. Example: inefficient procedures or unnecessary services.
- **Abuse:** Actions that may lead to unnecessary costs or violate accepted practices, even if not fraudulent. Example: excessive use of overtime without justification or enrolling consumers without confirming required documentation.

Policy Statement

GCI enforces a zero-tolerance policy for fraud, waste, and abuse. All employees and partners must operate ethically and lawfully. GCI will take corrective and disciplinary action when violations are discovered.

Prevention of Fraud, Waste, and Abuse

Consumer Awareness and Safeguards

Consumers are encouraged to report suspected fraud, waste, or abuse to Get Covered Illinois (GCI). When seeking assistance, please take the following precautions to help safeguard your personal information:

- **By Phone:** Always confirm that you have dialed GCI's official customer service number at (866) 311-1119. Ensure you are speaking with an authorized GCI representative before sharing any personal details. If you suspect identity theft or believe you may have shared information with someone not affiliated with GCI, contact us immediately.
- **Online:** Only use GCI's official website, getcovered.illinois.gov, for enrollment and information. GCI is not affiliated with any other websites. If another website claims to represent GCI or attempts to enroll you in a health plan, report it to GCI.
- **In-Person:** Confirm that the individual assisting you is a certified consumer assistance professional. Certified Navigators and Assisters are required to display their official certification number at all times when working with consumers. GCI Customer Support Representatives also carry official employee identification numbers. If you have concerns about someone's affiliation, contact GCI immediately.
- **Fees for Services:** All enrollment assistance provided by GCI is free of charge. Never provide payment to anyone offering to help you enroll in a plan through GCI. Report any requests for payment to GCI.
- **Personal Information Concerns:** Contact GCI promptly if you believe your personal information has been improperly accessed, used, disclosed, or destroyed.

If you suspect identity theft or that you gave your personal information to someone you should not have, contact the Federal Trade Commission at www.ftccomplaintassistant.gov.

Internal Controls

Get Covered Illinois (GCI) will:

- Implement and maintain access control measures for all sensitive systems.
- Restrict access to consumer data based on defined role-based authorizations.
- Enforce segregation of duties within financial and eligibility systems to ensure appropriate oversight and accountability.

Risk Assessments

GCI's Department of Marketplace Compliance & Program Integrity will conduct periodic assessments of risk areas, especially vendor activities, eligibility systems, and appeals processes.

Training

GCI staff, contractors, and vendors will receive:

- Annual training on FWA and reporting obligations.
- Training during onboarding and after significant policy updates.

Ethical Culture

GCI's Code of Conduct will reinforce ethical behavior. Employees and contractors are expected to comply at all times.

Fraud, Waste, and Abuse Detection and Monitoring

Ongoing Monitoring

GCI will regularly monitor systems for:

- Duplicate enrollments.
- Excessive appeals trends.
- Improper data access or security events.

Audits

GCI will perform:

- Internal compliance audits.
- Third-party audits where appropriate.
- Data quality reviews of eligibility, enrollment, and appeals activity.

Data Analytics

Automated analytics will be deployed to:

- Identify anomalies in enrollment or premium billing.
- Flag potential consumer impersonation or account access patterns.

Reporting Mechanisms for Fraud, Waste, and Abuse Complaints

GCI encourages staff, consumers, and the public to report suspected incidents of FWA. Reports can be made anonymously and confidentially without fear of retaliation.

Internal Reporting

Complaints of fraud, waste, and abuse can be reported to the GCI's Department of Marketplace Compliance & Program Integrity via the channels below:

- **In-Person:** 115 S. LaSalle St., 13th Floor, Chicago, IL 60603
- **GCI Hotline:** (866) 311-1119
- **GCI Website:** <https://getcovered.illinois.gov>
- **E-mail:** gci.privacy@illinois.gov

External Reporting

If you feel uncomfortable reporting an incident of fraud directly to GCI, or if you believe your employment or benefits may be at risk, reports may be made to the **Illinois Office of Executive Inspector General (OEIG)** via the channels below:

- **Phone:** (866) 814-1113
- **Online:** <https://oeig.illinois.gov/complaints/process.html>
- **Mail:** Office of Executive Inspector General, Attention: Complaint Division, 69 W. Washington St., Suite 3400, Chicago, IL 60602
- **Fax:** (312) 814-5479

Complaints regarding allegations of misconduct, fraud, waste, etc. related to entities under the jurisdiction of the Office of Executive Inspector General for the Agencies of the Illinois Governor may be submitted by anyone. Complaints may be submitted anonymously; however, a complaint must relate to the official conduct of:

- An employee of an executive branch state agency, board, or commission, or state public university under the jurisdiction of the OEIG;
- An employee of the Regional Transportation Authority, the Chicago Transit Authority, Metra, or Pace; or
- A person or entity (such as a vendor) doing business with an entity under the jurisdiction of the OEIG.

All reports to the Illinois OEIG are kept confidential.

Whistleblower Protections

Retaliation against individuals reporting in good faith is strictly prohibited. All reports are treated confidentially and may be submitted anonymously. GCI complies with applicable whistleblower protection laws and will take all necessary steps to ensure individuals are not subject to retaliation, harassment, or adverse consequences for reporting suspected wrongdoing.

Types of Reportable Violations

Examples of FWA to report include, but are not limited to:

- Misuse of GCI or state funds
- Falsification of application or employee records
- Unauthorized use or disclosure of consumer information
- Unauthorized access to confidential systems
- Unapproved absences without proper time reporting
- Activities that violate state or federal law

Investigation and Resolution

The GCI Department of Marketplace Compliance and Program Integrity will:

- Investigate all reports promptly.
- Document findings and maintain confidentiality.
- Coordinate with state authorities or CMS as needed.
- Notify the reporting individual, where appropriate and permissible by law, regarding the resolution or outcome of the investigation.

Violations may result in:

- Employee disciplinary action, including termination.
- Contract actions, including suspension or termination of vendors.
- Civil or criminal referrals.

Confidentiality and Protection

All FWA reports to GCI and the OEIG are handled confidentially. GCI will not tolerate retaliation against any individual for reporting FWA in good faith.

Training and Awareness

GCI will provide annual training and awareness materials on FWA to staff and partners. Training will cover FWA definitions, prevention strategies, reporting mechanisms, and real-world examples.

Legal References and Guidance

The following authorities and guidance materials also support this policy:

- False Claims Act, 31 U.S.C. §§ 3729–3733
- Illinois State Officials and Employees Ethics Act, 5 ILCS 430
- Civil Monetary Penalties Law, 42 U.S.C. § 1320a-7a
- Illinois Whistleblower Act, 740 ILCS 174
- CMS Fraud, Waste, and Abuse Training and Guidance
- OIG Compliance Guidance and Hotline

Review and Updates

This policy shall be reviewed annually and updated as needed to reflect legal or operational changes. Employees will be notified of updates and expected to comply.

Version History

Version	Date	Modified By	Description
1.0	05/28/2025	Melanie S. Berks	Initial Draft