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Reimagining FWA Prevention Through Design and Data
A New Approach to FWA Using AI and Human Insight

EXECUTIVE GUIDE

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INTRODUCTION

Most people want to do the right thing, so why does Fraud, Waste, and Abuse (FWA) persist? This ASG Executive Guide explores how clearly defining FWA, educating stakeholders, creating safe reporting pathways, and using AI/Automation to detect anomalies can help healthcare providers, plans, patients, and federal teams work together to protect our public programs.

The guide will step through how a human-centered, AI-supported framework can empower healthcare providers, plans, patients, and public servants alike to recognize risk, voice concerns, and safeguard the integrity of federal health programs.

CLARITY, CULTURE & COLLECTIVE RESPONSIBILITY: WHY IT MATTERS

FWA undermines public trust, inflates costs, and disrupts care. But unlike other domains where prevention is the sole responsibility of trained professionals, in health care, FWA prevention is everyone's responsibility: providers, plans, regulators, and the public.

A Shared Duty

From clinicians and coders to regulators and patients, FWA prevention spans a broad set of roles. Our systems must support a culture of integrity that is:

- Understood across roles
- Reinforced through action
- Accessible to all stakeholders

Key takeaway: Everyone has a role to play.

Communicating in Ways That Resonate

Too often, training and outreach rely on legal jargon or overly technical language. To create awareness that leads to action:

- Tailor messages by audience
- Use familiar, real-world examples
- Prioritize clarity over complexity

Use Data to Understand, Not Just Detect

Effective analytics can do more than flag outliers. They can:

- Reveal training gaps or process barriers
- Help prioritize outreach to at-risk groups
- Improve system design and communication

Example: Monitoring system behavior data trends may reveal high risk or anomalous behavior concentrated in specific groups. Upon review, required materials may not have been written or designed in the proper format, creating an unintentional access barrier.

Takeaway: Sometimes risk is not about intent, but design. Use data to ask better questions.

Modern program integrity goes beyond catching fraudsters — it means understanding why anomalies happen, and whether they reflect intentional abuse, process failure, or access gaps. This is where AI and automation add unique value.

Advanced analytics and automation can:

- Continuously scan vast datasets (e.g., claims, enrollment activity, training records) for outliers, patterns, or sudden shifts
- Apply machine learning to detect subtle correlations that human analysts may miss
- Support real-time alerts, accelerating interventions before financial loss escalates
- Help differentiate between malicious activity and systemic design flaws

Example: Automated monitoring reveals a recurring pattern of risky transactions among a subset of users. AI models find the common variable isn't geography or provider type—but language access. Required compliance materials were delivered only in English, though many users indicated a different primary language. The data helped uncover an access barrier, not a fraud ring.

Key Insight: Outlier behavior doesn't always mean bad actors. Sometimes it signals confusion, exclusion, or infrastructure failure. By combining automation for detection with AI for insight, we can move from a punitive model to a preventive and corrective one.

Takeaway: Use data as a flashlight, not just a siren. Ask:

- Are we designing systems people can succeed in?
- Are our tools and training inclusive by design?
- Where can clarity and communication reduce risk?

Technology + People = Smart Prevention

AI and automation can accelerate detection, but judgment and education still matter. Build teams that combine:

- Analysts
- Investigators
- Educators
- Policy and program experts

LEADERSHIP ACTIONS: WHAT YOU CAN DO NOW

Creation of a National Identity Platform

Build training, outreach, and compliance systems with the full range of users in mind—including those unfamiliar with healthcare processes, or for whom English is not a first language, or those who access services through community intermediaries.

Leverage AI for Pattern Recognition, Not Just Policing

Use AI and automation not just to flag outliers, but to surface patterns that could point to system design flaws, access gaps, or training deficiencies—especially in populations historically underserved or overlooked.

Act on What the Data is *Really* Telling you

When your data surfaces clusters of “risk,” ask: Is this fraud? Or is it confusion, access limitations, or unclear communication? Addressing these root causes can reduce downstream integrity issues and improve trust.

Tailor Education for the Audience, Not the Institution

FWA prevention materials should be adapted for the intended user—whether that’s a regulator, provider, intermediary, or public consumer. Different audiences need different messages, formats, and entry points.

Break the Silo Between Detection and Design

Encourage cross-functional collaboration between those who analyze data, design systems, and create training or outreach. When these teams work together, the result is smarter prevention and more inclusive compliance.

CONCLUSION: REFRAMING FWA AS A SHARED RESPONSIBILITY

Fraud, Waste, and Abuse prevention isn't just the job of regulators or compliance experts. In healthcare, it is everyone's job—agencies, providers, policymakers, outreach teams, and yes, even the public.

That's what makes this field both uniquely challenging and uniquely powerful.

When we use data not just to catch bad actors but to improve access, understanding, and system design, we elevate the mission of Program Integrity from enforcement to transformation. We prevent future fraud by building systems that work better for everyone—before things go wrong.

Leadership in this space means asking better questions, designing more inclusively, and turning risk data into insight, not just action. That's how we protect public trust—and make every tax dollar count.



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