



# Office of Medicaid Inspector General Updates

AFMC MMIS Annual Billing Workshop Fall 2023

## *OMIG Mission*

To detect and prevent **fraud, waste, and abuse** within the medical assistance program.



# *Who Audits Medicaid?*

- OMIG (Office of Medicaid Inspector General)
- Legislative Audit
- DHS (Retrospective Review)
- Qlarant (Unified Program Integrity Contractor)
- The PASSEs



# *OMIG Requirements*

To prevent, detect, and investigate fraud, waste, and abuse in the Medicaid Program.

Verify whether services reimbursed by Medicaid were properly billed and actually furnished to beneficiaries;

Recover improperly expended funds;

Report fraud and abuse;

Refer cases to for criminal prosecution;

Recommend and implement changes in Medicaid



# *Where do OMIG audits come from?*

- Fraud Hotline Complaints/Tips
- Law Enforcement Referrals
- Internal Referrals
- Referrals from Private Insurance Plans, PASSEs, other states
- Corrective Action Plan (CAP) compliance reviews
- OMIG Data Analytics



# *OMIG Data Analytics*

## *OPTUM Fraud and Abuse Detection System (FADS)*

- Provider Spike Detection
- Peer Review Analysis & Outlier Identification
- Algorithms
  - *Impossible Days*
  - *Overlapping Services*
  - *Unbundling Procedures*
- Claims Risk Analysis
- High-Cost Member Reporting



# *OMIG Audit Process*

## Field Audit

- Onsite Review
- Staff and Management Interviews
- Audit Scope:
  - OMIG may review claims that are 3 years old
  - OMIG may review claims that are 5 years old if fraud is suspected



# *OMIG Audit Process*

## Desk Audit

- OMIG requests records from the provider
- The provider must respond to a records request within 14 calendar days
- Audit Scope typically three years



# *OMIG Audit Process*

## Field Audit

- OMIG requests records from the provider
- Must provide records during field audit
  - Some exceptions apply!
- Advance notice is not required



# *Authority to Request Records*

## Program Integrity Function

- Arkansas Medicaid Manual
- §142.300 - *Conditions Related to Record Keeping*
- ***MAINTAIN YOUR RECORDS!!!***
- Enrollment Contract requirement
- §151.000 - *Grounds for Sanctioning Providers*

## Subpoena Power and Production of Records

- Ark. Code Ann. §20-77-2506



# *What are the possible outcomes of an OMIG audit?*

## Potential Outcomes

- No findings
- Area of Concern
- Observations - Non-monetary
- Findings – repayment
- MFCU/Law Enforcement Referral

Credible allegation of fraud-requires temporary suspension; possible exclusion from program

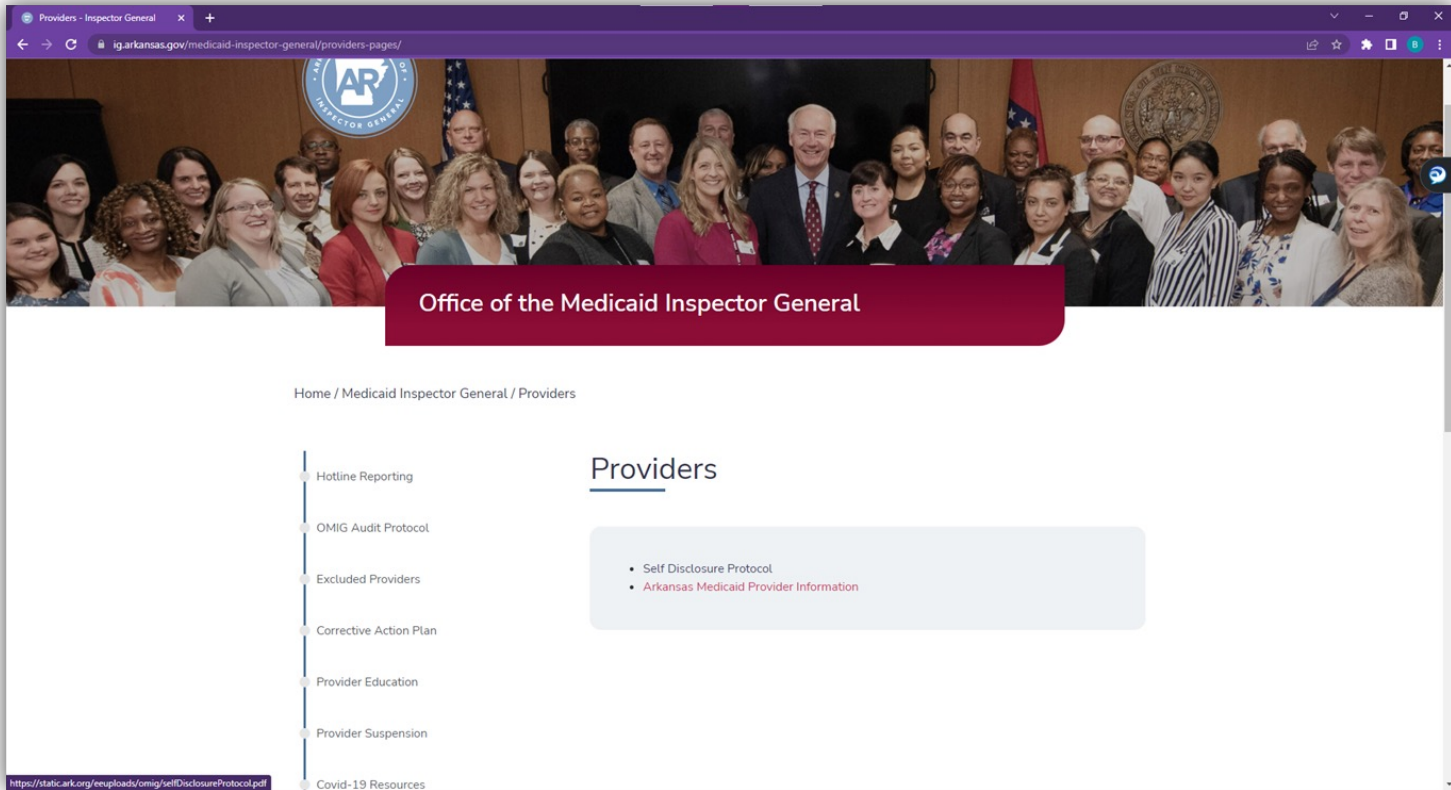


# *OMIG duties regarding Self-Reporting & Self-Disclosure*

- Develop protocols for efficient self-disclosure
- Consider a Medicaid Provider's **good faith** as a mitigating factor
- Self-Disclosure protocol on OMIG website  
<https://omig.arkansas.gov>
- **Note:** it is important for a provider to work with OMIG and not reverse claims unless told to do so. This creates uncertainty in the self-disclosure process.



# Provider Self-Disclosure Protocol



The screenshot shows a web browser window with the URL [ig.arkansas.gov/medicaid-inspector-general/providers-pages/](https://ig.arkansas.gov/medicaid-inspector-general/providers-pages/). The page features a large group photo of staff members in front of the Arkansas state seal. A maroon banner below the photo reads "Office of the Medicaid Inspector General". The breadcrumb trail is "Home / Medicaid Inspector General / Providers". A left-hand navigation menu lists: Hotline Reporting, OMIG Audit Protocol, Excluded Providers, Corrective Action Plan, Provider Education, Provider Suspension, and Covid-19 Resources. The main content area is titled "Providers" and contains a light blue box with two links: "Self Disclosure Protocol" and "Arkansas Medicaid Provider Information". A footer link at the bottom left points to <https://static.ark.org/reuploads/omig/selfDisclosureProtocol.pdf>.

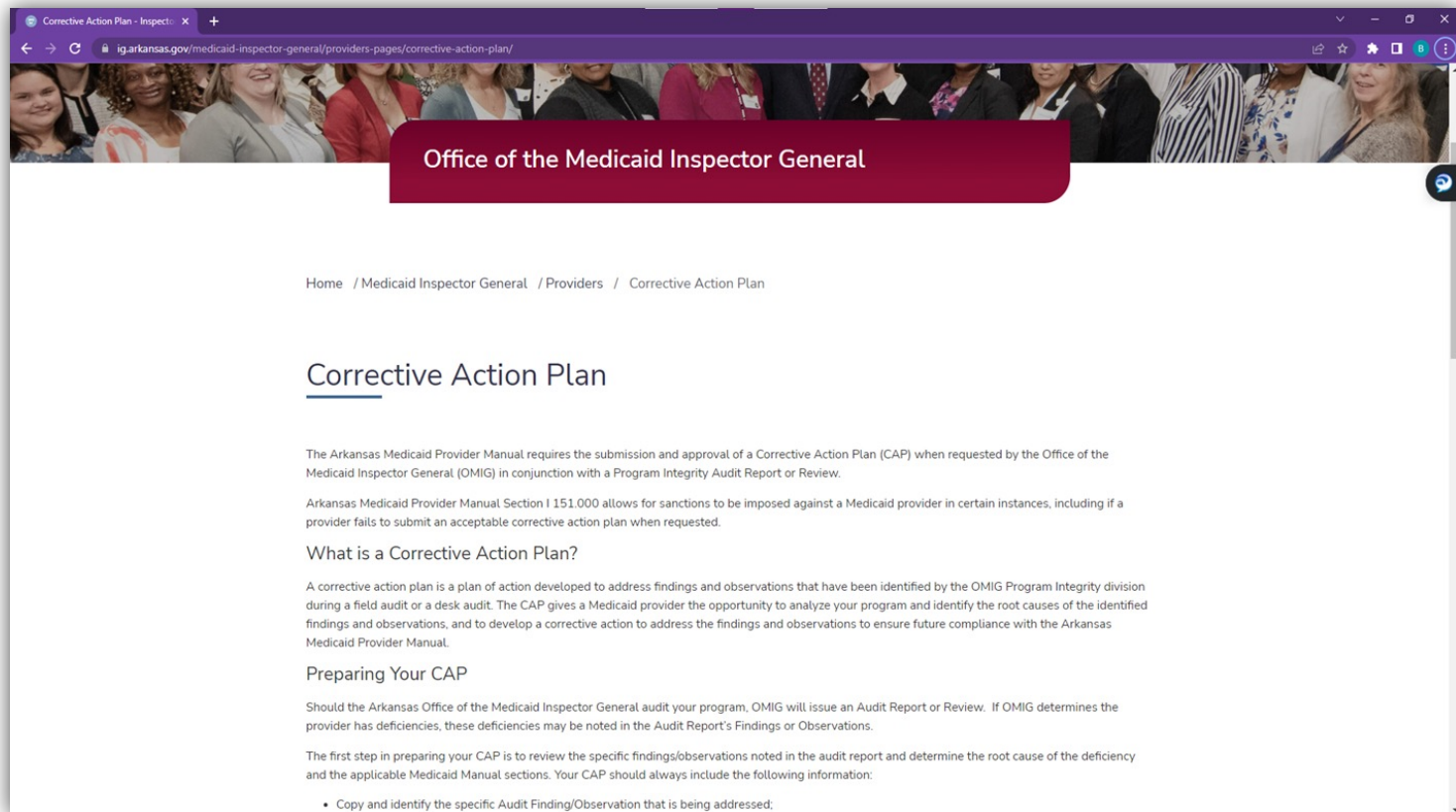


# *Provider duties regarding Corrective Action Plans*

- Develop a plan of action addressing findings, observations, and areas of concern
- Be specific in your steps and procedure
- Provide a person/name/position for accountability
- Provide date plan implemented



# Corrective Action Plans



The screenshot shows a web browser window with the URL [ig.arkansas.gov/medicaid-inspector-general/providers-pages/corrective-action-plan/](https://ig.arkansas.gov/medicaid-inspector-general/providers-pages/corrective-action-plan/). The page features a header image of a diverse group of people, with a dark red banner overlay containing the text "Office of the Medicaid Inspector General". Below the banner, a breadcrumb trail reads "Home / Medicaid Inspector General / Providers / Corrective Action Plan". The main heading is "Corrective Action Plan". The text explains that the Arkansas Medicaid Provider Manual requires the submission and approval of a Corrective Action Plan (CAP) when requested by the Office of the Medicaid Inspector General (OMIG) in conjunction with a Program Integrity Audit Report or Review. It also states that Arkansas Medicaid Provider Manual Section I 151.000 allows for sanctions to be imposed against a Medicaid provider in certain instances, including if a provider fails to submit an acceptable corrective action plan when requested. The page includes sections for "What is a Corrective Action Plan?" and "Preparing Your CAP".

Office of the Medicaid Inspector General

Home / Medicaid Inspector General / Providers / Corrective Action Plan

## Corrective Action Plan

The Arkansas Medicaid Provider Manual requires the submission and approval of a Corrective Action Plan (CAP) when requested by the Office of the Medicaid Inspector General (OMIG) in conjunction with a Program Integrity Audit Report or Review.

Arkansas Medicaid Provider Manual Section I 151.000 allows for sanctions to be imposed against a Medicaid provider in certain instances, including if a provider fails to submit an acceptable corrective action plan when requested.

### What is a Corrective Action Plan?

A corrective action plan is a plan of action developed to address findings and observations that have been identified by the OMIG Program Integrity division during a field audit or a desk audit. The CAP gives a Medicaid provider the opportunity to analyze your program and identify the root causes of the identified findings and observations, and to develop a corrective action to address the findings and observations to ensure future compliance with the Arkansas Medicaid Provider Manual.

### Preparing Your CAP

Should the Arkansas Office of the Medicaid Inspector General audit your program, OMIG will issue an Audit Report or Review. If OMIG determines the provider has deficiencies, these deficiencies may be noted in the Audit Report's Findings or Observations.

The first step in preparing your CAP is to review the specific findings/observations noted in the audit report and determine the root cause of the deficiency and the applicable Medicaid Manual sections. Your CAP should always include the following information:

- Copy and identify the specific Audit Finding/Observation that is being addressed;



# *How can I report Medicaid Fraud to OMIG?*

- OMIG Fraud Hotline: [1-855-527-6644](tel:1-855-527-6644)
- [Omig.fraud@arkansas.gov](mailto:Omig.fraud@arkansas.gov)
- [Report Medicaid Fraud, Waste, or Abuse to the Office of Medicaid Inspector General.](#) \*

*\*If viewing this slide electronically, this is a direct link to the online portal to report fraud.*



# Q&A



# Contact Info

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