These slides accompany the 2024 UOIG FWA Prevention Training.
Please attend the training to fulfil your training requirement for Medicaid Fraud, Waste, and Abuse Prevention.

OIG
Utah Office of
Inspector General

Outline

UOIG Overview

FWA Improper Payments

Common FWA Schemes

High Risk Program Areas

The False Claims Act

Payment Suspensions

Reporting FWA to the UOIG

Tips for Providers
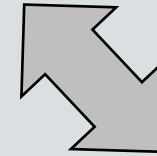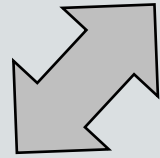
UOIG Contact Information

UOIG Goal

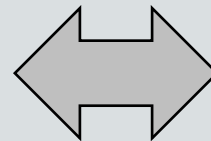# Eliminate Medicaid Fraud, Abuse, and Waste

The Office of Inspector General of Medicaid Services will protect taxpayer dollars by identifying fraud, abuse, and waste risks and vulnerabilities in the State Medicaid Program and by taking action to mitigate or eliminate those risks.
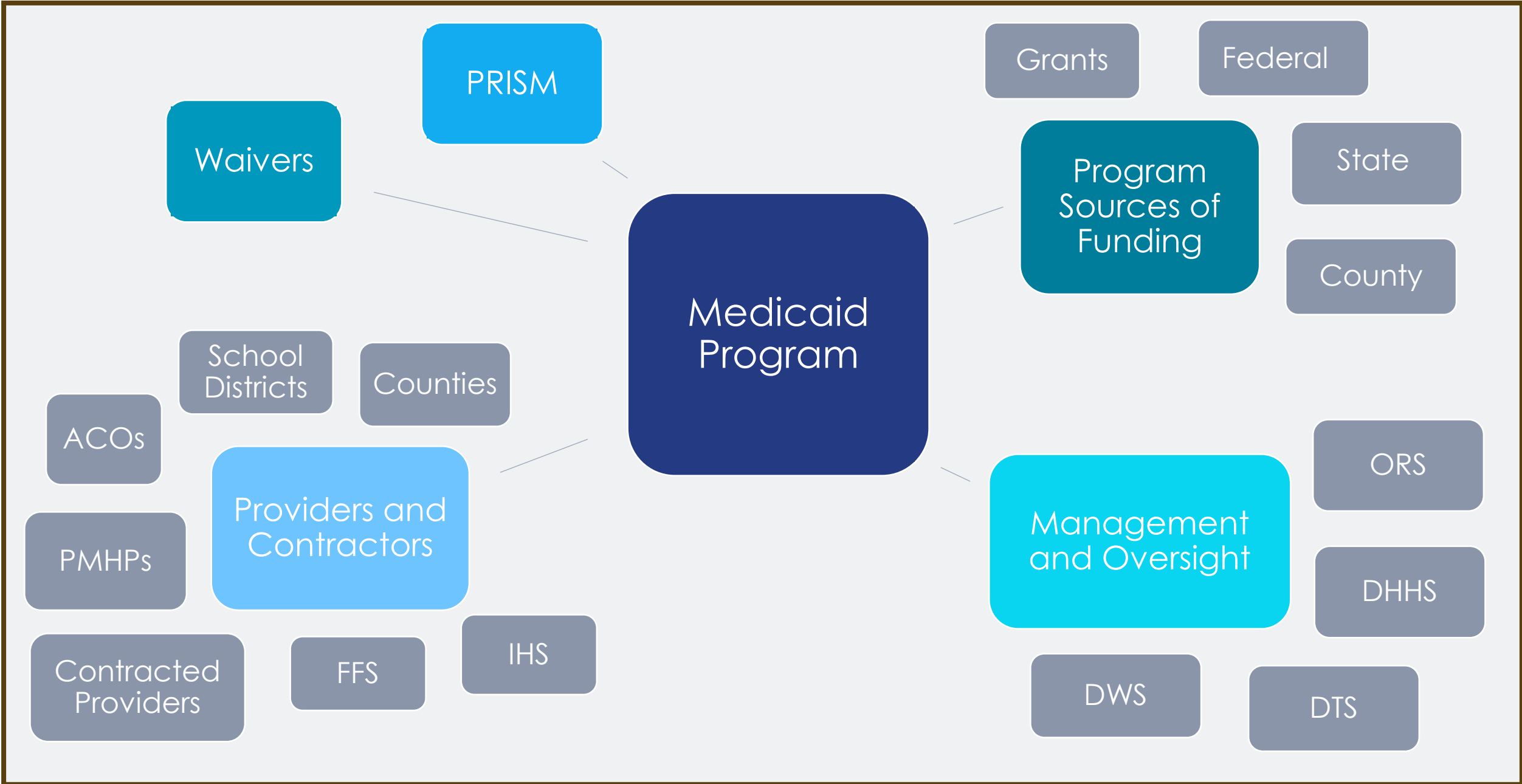
UOIG Mission

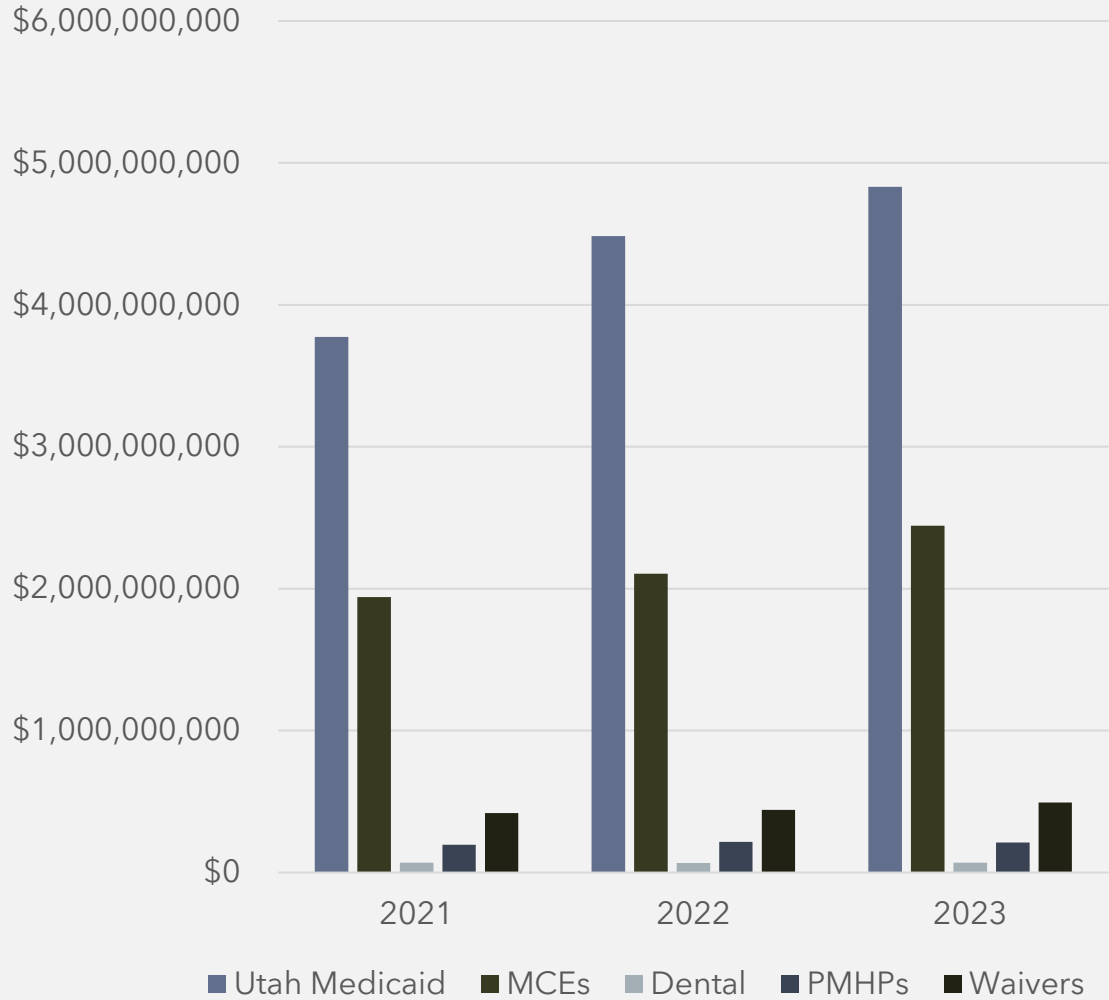Policy Recommendations & Procedural Opportunities
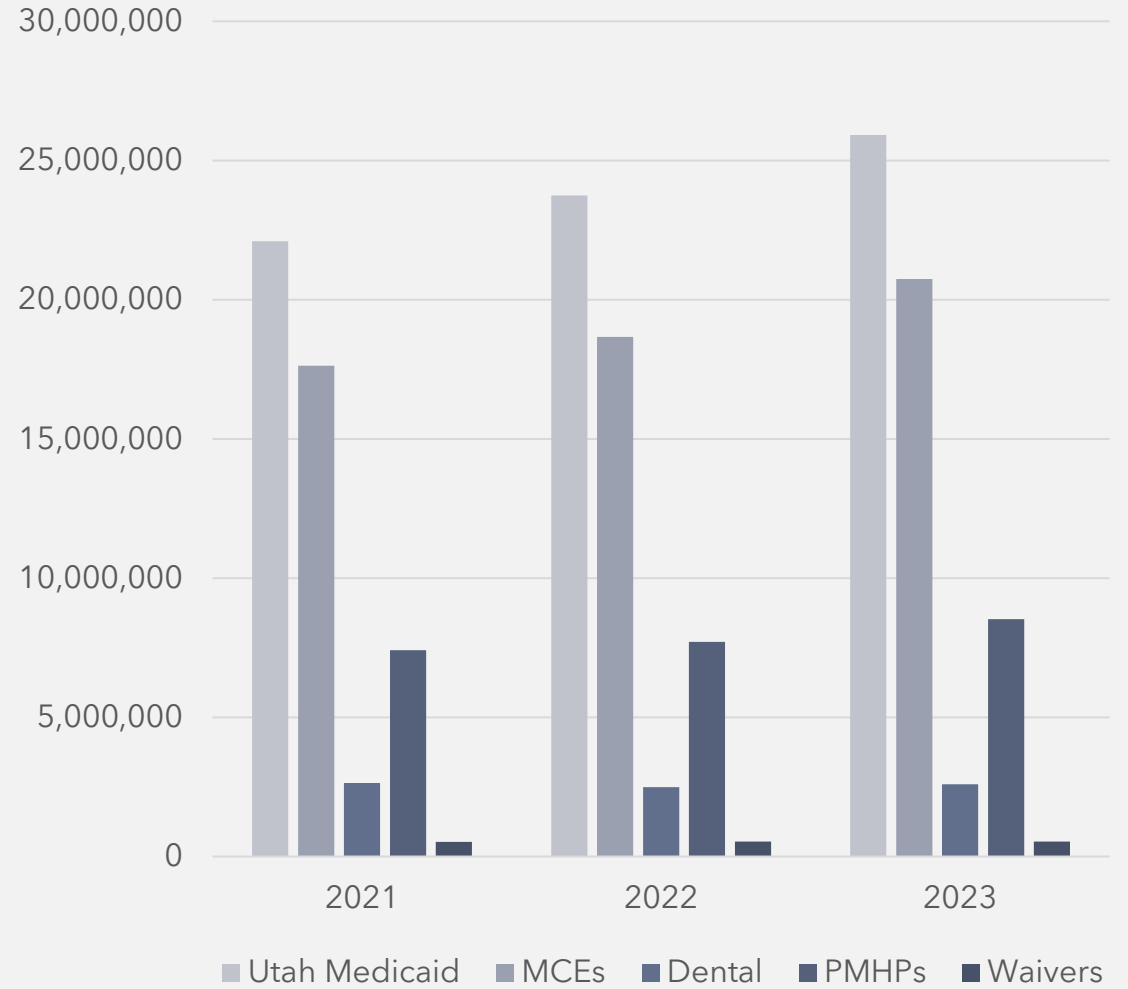
Review of Claims History

UOIG Oversight Universe

Utah Medicaid

Total Expenditures — Number of Claims/Capitations bar charts for 2021, 2022, 2023 with categories: Utah Medicaid, MCEs, Dental, PMHPs, Waivers
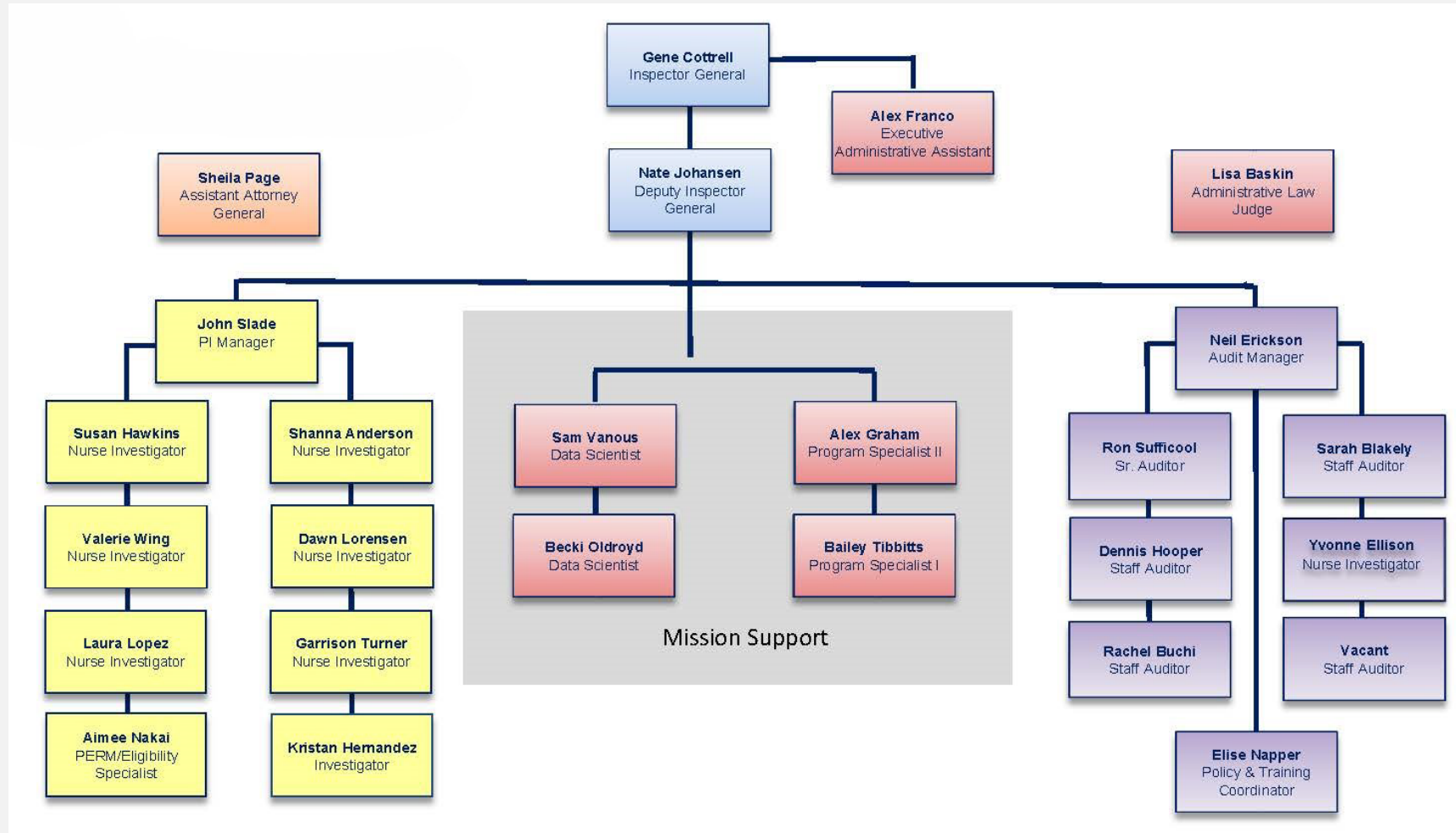
UOIG Org Chart

UOIG Audits

Must Remain Independent

Reviews Policy & Procedure

Reviews What Has Occurred

Makes Recommendations

Tests Controls

UOIG
Program Integrity & Investigations

Receives Complaints

Conducts Preliminary Reviews

Identifies Overpayment Amounts

Issues Notices of Recovery

Program Integrity Functions

UOIG Recent Recoveries
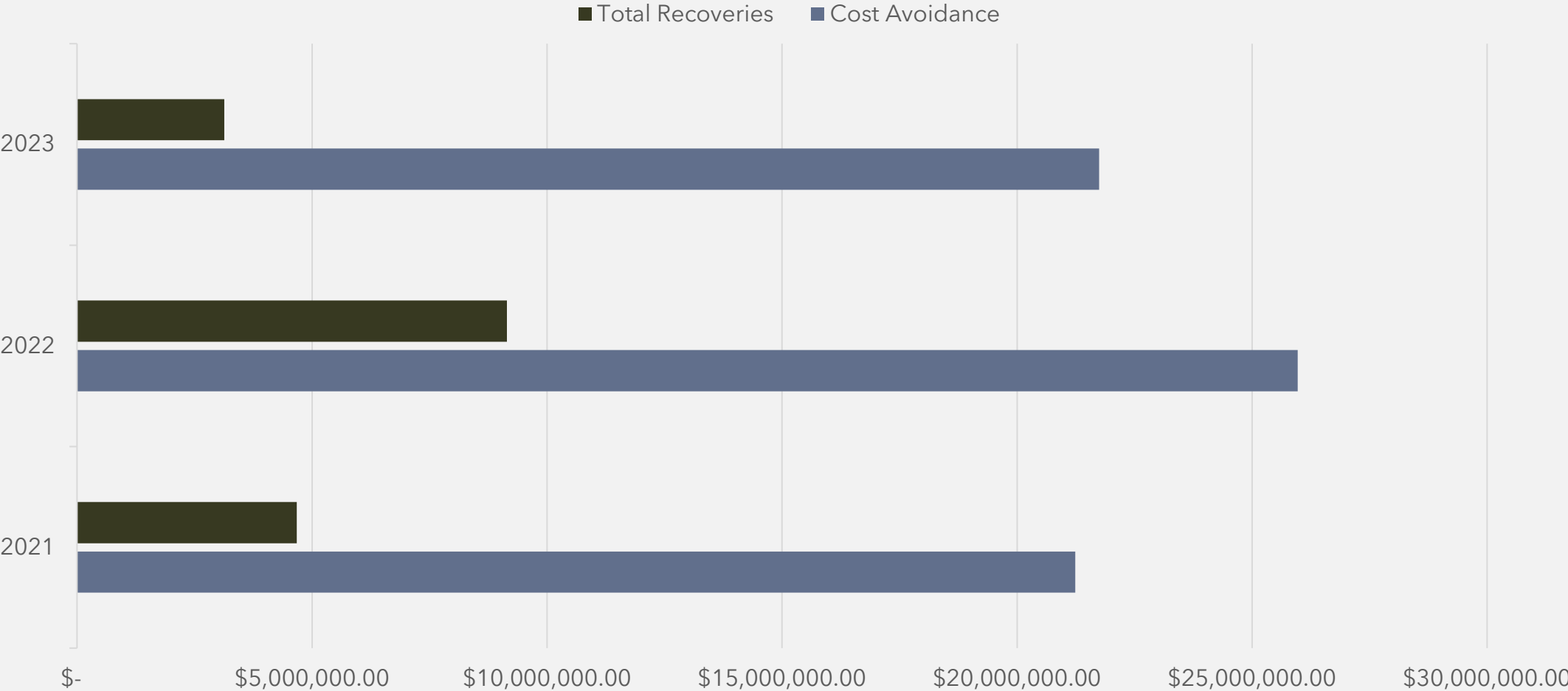
Causes of Improper Payments

Errors	Waste	Abuse	Fraud

Mistakes   Inefficiencies   Bending Rules   Intentional Deception
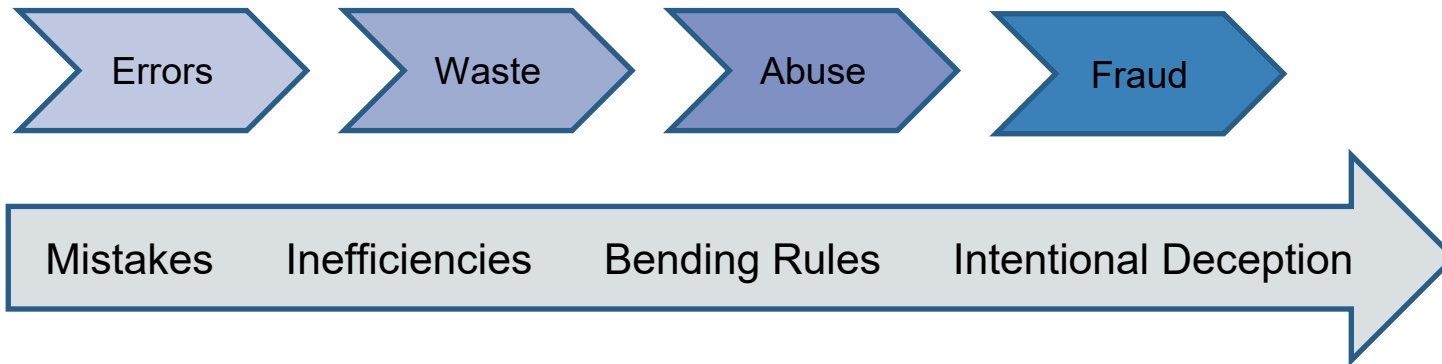
Most common payment errors:
- Insufficient documentation
- Unintentional billing errors

Q. Who might perpetrate fraud against Medicaid?

A. Anyone who can influence the outcome of service provision, billing, records and documentation, or eligibility

Common Provider FWA Examples

Billing for services not rendered and/or supplies not provided

Double billing

Coding schemes:
- Unbundling
- Upcoding

Altering medical documentation or claim forms

Misrepresentation of medical conditions or services

Soliciting, offering or receiving a kickback, bribe or rebate

Failure to report third party liability in billing

Balance Billing

"A provider who accepts a member as Medicaid patient must accept the Medicaid or state payment as reimbursement in full"

Unlikely Hours

"…services must be administered by agency staff only as ordered by a physician and approved in the plan of care."

Ghost Employees

"Providers are prohibited from submitting inaccurate Medicaid claims."

Drug Diversion

"The Medicaid Pharmacy program reimburses for covered outpatient drugs dispensed to eligible Medicaid members by a pharmacy enrolled with Utah Medicaid pursuant to a prescription from an enrolled prescriber…"

Eligibility Schemes

"To be eligible for Medicaid, you must meet a program type and meet the rules for Utah residency, income, and citizenship."

Reassignment of Billing Scheme

"As an approved Medicaid Provider, you are able to manage and update your information in PRISM."

Personal Care/ Home Health

Fraud, Waste, and Abuse Prevention

Transportation

Fraud, Waste, and Abuse Prevention

Electronic Visit Verification

Fraud Waste, and Abuse Prevention

Behavioral Health Related Organizations

Fraud, Waste, and Abuse Prevention

Telehealth

Fiscal Responsibility

Deficit Reduction Act

Federal False Claims Act

Utah False Claims Act

Qui Tam Incentives & Whistleblower Protections

Provider Agreements

Medicaid Contractual Obligations

A person who knowingly submits a false claim is liable for up to three times the amount of the federal government's damages, plus penalties of $13,946 to $27,894 per claim.

What is a Whistleblower?

Whistleblower Protection Act
Qui Tam Incentives

LEIE

The LEIE is a regularly updated list of individuals who are excluded from receiving Medicaid payments and reimbursement.

Anyone who hires an individual or entity on the LEIE may be subject to civil monetary penalties.

The UOIG recommends regular, routine checks of the LEIE, to ensure that staff and contractors are not listed.

https://exclusions.oig.hhs.gov/

Payment Suspension
42 CFR §455.23

"The State Medicaid agency must suspend all Medicaid payments to a provider after the agency determines there is a credible allegation of fraud for which an investigation is pending..."

Utah Code 63A-13-501

"A health care professional, a provider, or a state or local government official or employee who becomes aware of fraud, waste, or abuse shall report the fraud, waste, or abuse to the Office"

Reporting to the UOIG

Suspected Fraud, Waste or Abuse may be reported to The Utah Office of Inspector General.

Reports can come from anyone and can be anonymous.

Please call the UOIG Hotline:
(855) 403-7283

Email a completed UOIG Referral Form:
MPI@utah.gov

Or complete a referral online on the UOIG website:
https://oig.utah.gov/

Medicaid Policies Change Frequently

Follow the Medicaid policy that is in effect at the time of service provision.

Adhere to Medicaid service record documentation requirements.

Policy Resources

Medicaid Information Bulletins (MIBS)

Medicaid Provider Manuals

Utah Administrative Rules

Medicaid Contracts

State Plan and Waiver Plans

CMS

Records Requests

Records must be submitted within 30 calendar days.

Ensure your contact information in PRISM remains up-to-date.

If you telework, update your contact information and check your office mail and voicemail regularly.

Training Opportunities

The UOIG is available to provide training directly to professional organizations, and to tailor the content of the training to each audience.

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Thank you

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https://oig.utah.gov