

CONTACT TOOL EXAMPLE

- Actual example recreated from Provider Self Disclosure Information (identifying information sterilized)
- Issue: Provider found that a BSCs progress notes were duplicates of each other
- Reliance on this tool led Provider to believe that the issue was resolved. However, further review revealed that services were not rendered.

Phone Survey

Survey done by: _____

Purpose of Survey: to access consumer satisfaction with BSC for client _____

Survey Date: 9/4/-

Client Name: "B"

Person Interviewed: "S"

1. Does your BSC keep scheduled appointments: Yes__x__ No_____
2. Does your BSC discuss treatment plan issues with you? Yes__x__ No_____
3. Do you feel your BSC is knowledgeable about your child's diagnosis and treatment plan goals Yes__x__ No_____
4. Is your making progress Yes__x__ No_____
5. Are you satisfied completely with your child's team Yes__x__ No_____
6. Do you want any team member replaced Yes_____ No__x__
7. Would you please rate your BSC
Excellent __x__
Good _____
Fair _____
Poor _____

Comments:

S stated, "my team is wonderful". S further stated, "my BSC is knowledgeable and I would never want her replaced"

CBHNP Role in Fraud and Abuse

April 29, 2004

I. Integrated Part of Corporate Compliance

- A. Corporate Compliance Officer is the Fraud and Abuse Coordinator
- B. The Corporate Compliance Committee is the Venue for all Fraud and Abuse Discussions and Decision
- C. Fraud and Abuse requirements are incorporated into the Code of Conduct Process
- D. CBHNP puts equal emphasis on self-monitoring and provider monitoring

II. Fraud and Abuse Program Requirements

- A. Must have experienced Fraud and Abuse Unit
- B. Must maintain and comply with written policies and procedures
- C. Duty to Report
 - 1. Subject of Targeted Review
 - 2. Quarterly Report
- D. Duty to Cooperate with Oversight Agencies
- E. Fraud and Abuse Hotline
- F. Duty to Notify Department

III. Integral Fraud and Abuse Unit

- A. Corporate Compliance
- B. Corporate Privacy Officer
- C. Director Provider Relations
- D. Claims Director
- E. Clinical Quality Reviewer and Educator
- F. Director Clinical Operations

IV. Types of Fraud

- A. Provider Fraud
 - 1. Individual(s) Practitioner
 - 2. Systemic or management
- B. Recipient
 - 1. Medication
 - 2. Ineligible Recipient (fake ID)

V. How it is Identified

A. Responsive

1. Hotline or other tip
2. Complaint
 - a) Parent or family
 - b) Employee or ex-employee
 - c) Third party
3. Coordination and Collaboration
 - a) Provider identification
 - b) BPI, Attorney General, etc.
4. Proactive
 - a) Audits
 - (1) *Claims Patterns*
 - (2) *Service Patterns*
 - b) Onsite visits
 - (1) *Service Documentation*
 - (2) *Signature*
 - (3) *Time Comparison*

VI. Response to allegation or suspicious finding

A. Fraud and Abuse Review

B. Report to MCO

C. Investigation

1. Review of Claims

2. On-site visit

3. Cooperation with Providers

4. Coordination with other involved parties

D. Determination

E. Final Report

F. Recovery of Funds

LaVerne Yutzy, Philhaven

How they started their corporate compliance program and the benefits they have found

Implementation

- Consultant – audit of high risk areas
- 11 recommendations
- Board resolution
- Code of Organization ethics
- Director of Integrity
- Self Reporting Process
- Existing integrity related policies
- Train to be trainers

Ongoing Activities – Director of Integrity

- Staff training
- Staff reporting
- Education about integrity program
- High risk area
- Board of Directors
- Integrity Committee
- Agenda
- Internal & external audits
- Financial, payers, state accrediting
- Correction action
- Concerns identified by staff
- High risk areas
- Internal auditing
- Monitor results
- Goals for year

First Year

- Two billing issues
- Four human resource issues
- Billable hours status
- Comp time
- Documentation issues
- One copyright issue
- BHR FB-100% review
- Mobile therapist fraud/updated info used in billing
- Monitor alleged abuse/expand audit in pharmacy charge
- Nursing home consults: education & bill
- Relationship with drug companies

LaVerne Yutzy (cont)

Benefits of Corporate Complaint Program

- Increased awareness
- More proactive & intention
- Increased education
- Increased internal audits
- Improved follow up
- Coordinated efforts
- Increased likeliness of compliance
- Demonstrates commitment to integrity
- Sleep better

PROVIDER INFORMATION SHEET – 4/29/04

1. **Medical Assistance Regulations and Bulletins**

WEB SITE ADDRESS: www.dpw.state.pa.us/omap

(choose OMAP/provider information/MA regulations/applicable provider type)

2. **Provider Handbooks Under PROMISe**

There are 4 provider handbooks based on invoice type. The website address is:

<http://www.dpw.state.pa.us/omap/provinf/omapprovvhb.asp>.

Click on the provider handbook and billing guide link; the handbooks and billing guides are listed in alphabetical order by provider type. You can print the entire handbook, but there are numerous links that you need to go to and print from as well. The handbook is no longer a stand alone document. Regulations and Bulletins are in separate areas, as are the various appendices (i.e., Special Forms, Glossary, etc.) Updates to the handbook are made almost daily and Providers must check the website frequently to see if anything has changed.

3. **Additional MA Information under fraud/abuse menu**

WEB SITE ADDRESS: www.dpw.state.pa.us/omap

- General Information & Examples
- OMAP Compliance Hotline
- BPI Reviews & Results
- Medichcek List
- Self Audit Protocol
- Compliance Plans
- Privacy Policy
- MA Bulletins Relating To BPI
- Fraud/Abuse Compliance Links

4. **To report compliance issues**

- OMAP/BPI Hotline #: 1-866-DPW-TIPS (1-866-379-8477)
- E Mail: omaptips@state.pa.us
- DPW Website: www.dpw.state.pa.us/omap/omapfahotline.asp

5. **To validate license status through the Department of State**

WEB SITE ADDRESS: www.mylicense.state.pa.us

6. **To check the precluded/excluded status of a prospective employee/entity/provider**

WEB SITE ADDRESS: www.dpw.state.pa.us/omap

- Medichcek: OMAP/fraud/abuse/Medichcek/enter information bottom of page
- LEIE (OIG/Dept of Health & Human Services Excluded Individuals & Entities): OMAP/fraud/abuse/OIG link/enter information