

# MLTC Program Integrity Reporting

Medicaid Advantage Plus, PACE and Partial Capitation

**FEBRUARY 13, 2025** 

## **MLTC Program Integrity Reporting**

# Program Integrity Reporting

- Notification to Audit Clearance process to prevent duplication of efforts between plans and OMIG.
- Provider Investigative Report Quarterly report of closed program integrity reviews of providers.

### **Notification to Audit**

- Medicaid Advantage Plus, Section 19.9
- PACE, Article VI(P)
- Partial Capitation, Article VIII(Q)

### Notification to Audit

- 1. The Contractor shall notify the OMIG of its intention to initiate an audit of a Participating Provider or Non-Participating Provider. The following shall constitute the notification process. For the purposes of this Section, an audit refers to activity which will or may result in a post payment recovery and/or referral to the OMIG in accordance with Article IX, Section BB of this Contract.
  - a. The notification to audit shall be communicated by the Contractor to the OMIG in a form and format to be determined by SDOH and OMIG. The notification to audit shall include (at a minimum) the following information: provider name, provider address, audit scope and time period to be reviewed.
  - b. Upon receipt of the Contractor's notification to audit, the OMIG shall within ten (10) business days:
    - i. Acknowledge receipt of the notification; and
    - ii. Acknowledge that there is no conflict with the Contractor conducting the audit; or
    - iii. Alert the Contractor to stop the audit or any further activity if a conflict exists.
  - c. If the Contractor does not receive a response from the OMIG in ten (10) business days, the Contractor may proceed with its audit.
  - d. Notwithstanding the above, the OMIG may initiate an audit of the Contractor's provider at any time.

- 2. The OMIG shall notify the Contractor of its intention to initiate an audit of a Participating Provider in the Contractor's network or Non-Participating Provider. The following shall constitute the notification process.
  - a. The OMIG shall email the notification to audit to the Contractor's designee. The notification to audit shall include (at a minimum) the following information: provider name, provider address, audit scope and time period to be reviewed.
  - b. Upon receipt of OMIG's notification to initiate an audit, the Contractor's designee shall respond within ten (10) business days as follows:
    - i. Acknowledge receipt of the notification by email; and/or
    - ii. Alert the OMIG of a conflict.
  - c. If the OMIG does not receive a response from the Contractor within ten (10) business days, the OMIG may proceed with its audit.
  - d. Upon receipt of OMIG's notification to initiate an audit, the Contractor shall provide to OMIG, in a form and format required by OMIG, all records required by OMIG to complete its audit, investigation or review of the Contractor's Participating or Non-Participating Provider, or subcontractor. The Contractor shall provide such records to the OMIG within ten (10) business days of OMIG's notification to initiate an audit.

- 3. Once notified of OMIG's intent to audit a Participating Provider or Non-Participating Provider, the Contractor shall not take any of the following actions as they specifically relate to Medicaid claims, and the audit scope and time period identified in OMIG's notification of intent to audit:
  - a. Initiate an audit of the same provider;
  - b. Enter into or attempt to negotiate any settlement agreement with the provider; or
  - c. Accept any monetary or other thing of valuable consideration offered by the provider.

### **Notification to Audit**

- These requests should be submitted at the beginning of any review.
- This requirement is intended to prevent duplication of efforts between the Plans and OMIG.
  - Requests should only be denied where there is an existing review of the same provider for the same allegation and time period; or it would interfere with an active investigation.

### **Notification to Audit – Plan Requests**

- Plans are required to request clearance from OMIG at the start of their review of a provider utilizing the OMIG
  19.9 Audit Notification Form. Direct all requests to the <a href="mailto:mmcreporting@omig.ny.gov">mmcreporting@omig.ny.gov</a> mailbox.
- Should the Plan have multiple requests to submit in a 24-hour period, they should be submitted on one form.

	А	В	С	D	E	F
	MCO MMIS ID	MCO Name	Plan Type	MCO Case ID	Provider Name	Provider MMIS ID
!						
}						

• OMIG has ten (10) business days to respond to the plan request with either an approval or denial. Should OMIG not respond within ten (10) business days, the plan may proceed with their review of the provider.

# **Completing the Request Form**

- The information contained in the report falls into two primary categories.
  - Identifiers
  - Allegation Information

## **Completing the Request Form**

- Identifiers
  - MLTC Identifiers
    - MCO MMIS ID
    - MCO Name
    - Plan Type
    - MCO Case ID
  - **Provider Identifiers** 
    - Provider Name
    - Provider MMIS, NPI and FEIN
    - Provider Address

## **Completing the Request Form**

- Allegation Information
  - Audit Scope Allegation
  - Scope Period Dates
  - Scope Period Type (DOS vs. DOP)
  - Reason for Initiation of Audit
  - Comments

## **Notification to Audit – OMIG Requests**

- OMIG will submit notification to the Plans at the start of an audit of a provider's managed care claims activity. The Plan will receive a Notification to Audit the provider that will include the time period and scope of the review.
- Plans have ten (10) business days to respond to the request from OMIG with either an approval or denial. Should the Plan not respond within ten (10) business days, OMIG may proceed with their review of the provider.

### **MLTC Audit Notification**

### Next Steps:

- After this presentation, the Mainstream and MLTC Plans will receive a guidance document and copy of the OMIG 19.9 Audit Notification Form.
- MLTCs are required to begin submitting Audit Notification Requests effective March 1, 2025 (Mainstream Plans are already complying with this requirement.)
- OMIG staff will review requests and provide feedback should additional information be needed. The MLTCs have five (5) business days to respond with any requests for additional information.
- Questions may be submitted to OMIG via the <a href="mmcreporting@omig.ny.gov">mmcreporting@omig.ny.gov</a> mailbox.

### **Provider Investigative Report**

- Medicaid Advantage Plus, Section 18.5(c)(xiii)
- PACE, Article VI(E)(3)(o)
- Partial Capitation, Section VIII(F)(3)(s)

- Medicaid Advantage Plus, Section 18.5(c)(xiii)
  - "The Contractor shall submit to SDOH and OMIG a quarterly report, in a form and format to be determined by OMIG in consultation with SDOH, of all Participating Provider and Non-Participating Provider investigative and educational or re-educational activities. This report will include, but is not limited to, copies of any agreements executed between the Contractor and Participating Providers and Non-Participating Providers as a result of the action and a summary of the investigative results."
- PACE, Article VI(E)(3)(o)
  - "The Contractor shall submit to the Department and OMIG a quarterly report, in a form and format to be determined by OMIG in consultation with the Department, of all Participating Provider and Non-Participating Provider investigative and educational or re-educational activities. This report will include, but is not limited to, copies of any agreements executed between the Contractor and Participating Providers and Non-Participating Providers as a result of the action and a summary of the investigative results."

## **MLTC Model Contracts Language Cont.**

- Partial Capitation Article, Section VIII(F)(3)(s)
  - "The Contractor shall submit to the Department and OMIG a quarterly report, in a form and format to be determined by OMIG in consultation with the Department, of all Participating Provider and Non-Participating Provider investigative and educational or re-educational activities. This report will include, but is not limited to, copies of any agreement executed between the Contractor and Participating Providers or Non-Participating Providers as a result of the action and a summary of the investigative results."

# **Provider Investigative Report (PIR)**

- The report is designed to receive information regarding all closed reviews of provider billing. This includes completed:
  - Audits;
  - Investigations;
  - **Educational Activities**;
  - Re-educational Activities;
  - Credible Allegations of Fraud Withholdings; and
  - Provider Self-disclosures.

## **Accessing the Report**

- The MLTC PIRs are currently quarterly reports that utilize the same structure as the Medicaid Managed Care Operating Reports (MMCOR) through the Universal Data Collection System (UDCS).
  - Each line of business will have a different submission type.
    - Medicaid Advantage Plus MMCPIRMAP
    - PACE MMCPIRPACE
    - Partial Capitation MMCPIRPC
- The MLTC will need to have representatives with access to the Health Commerce System (HCS).
- The report template and submissions are accessed through the Healthcare Financial Data Gateway (Gateway).
- The MLTC will designate individuals who will be submitters of the report and an individual with the responsibility of certifying the contents of the report. The certifier can be either the CEO, CFO or a designee who reports to either the CEO or CFO.

## **Accessing the Report**



### **Healthcare Financial Data Gateway**

New York State Department of Health

Welcome Kelly Sciara

Request Access Contact

Help

Home

Software

Submissions

Reports

Administration

### Welcome to the Healthcare Financial Data Gateway

The navigation bar above contains selectable tabs for each functional area of the application and is used to navigate throughout the application.

Please read the descriptions of these areas below:

The "Software" tab is used to download the Cost Report Software, Matrix Reports and supporting documentation. Items Software:

selected for download will be saved as a zip file.

The "Submissions" tab can be used to do any of the following. Submissions:

· Submit your Completed and Finalized Cost Report

· View the Details of Submissions

· Certify and Print Submitted Cost Report

The "Reports" tab is used to view and export (to Excel) a history of Submission and Certification details for the Cost Reports:

Reports.

Administration: The "Administration" tab can be used to do any of the following.

· Grant permissions to the applications, with or without email notifications

· Manage Certifications

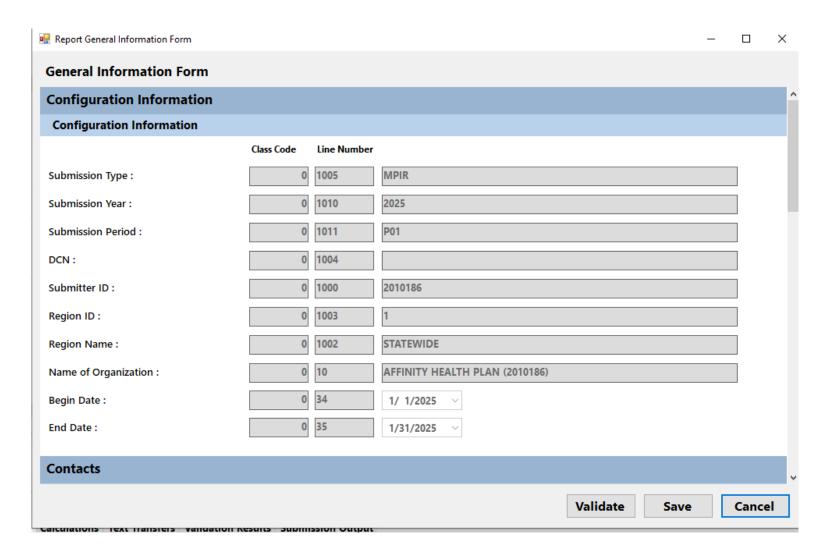
Manage Roles

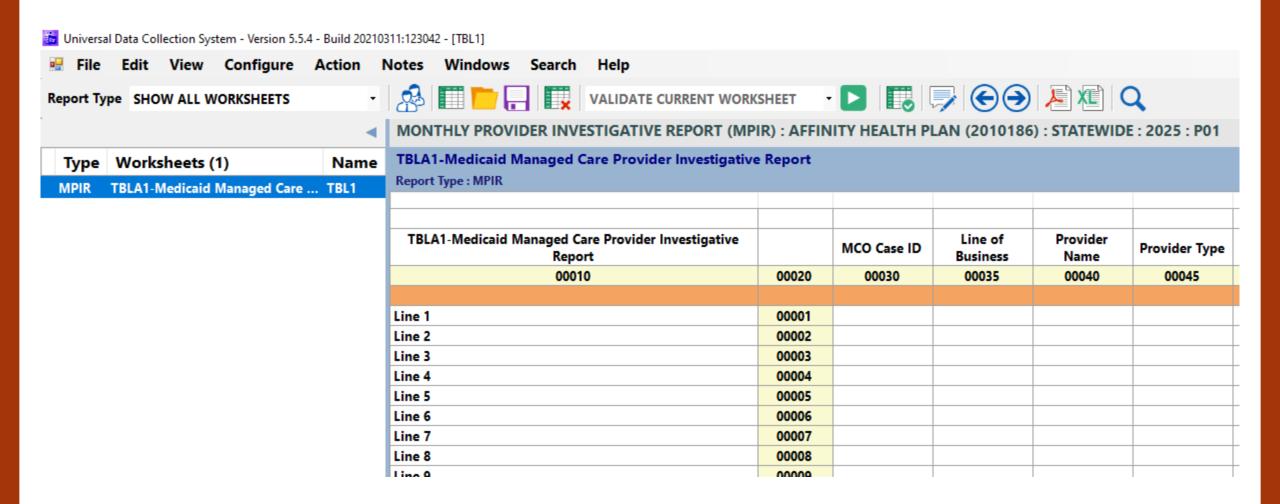
Set Submission Cut Off Dates

Upload Software, Reports and Supporting Documentation

# **Accessing the Report**

- Each quarter, the MTLCs will receive notification from OMIG that the report is ready for completion, including a copy of the guidance document.
- MLTC submitters will download the template from the Gateway and complete their report in the UDCS.
- Once the report has been completed, the submitter will upload a copy of the report to the Gateway along with any settlement agreements executed during the reporting period. Following the submission of the report, the certifier will certify the report in the Gateway.





- The information contained in the report falls into three primary categories.
  - Identifiers
  - Allegation Information
  - Recovery Information

- Identifiers
  - **MLTC** Identifiers
    - MCO Case ID
    - Line of Business
  - Provider Identifiers
    - Provider Name
    - Provider Type
    - FEIN
    - NPI
    - MMIS
    - NY License #

- **Allegation Information** 
  - **Action Type**
  - Review Type (Individual vs. Multiple Providers)
  - **Allegation Category**
  - Allegation
  - **Scope Period Dates**
  - Scope Period Type (DOS vs. DOP)
  - Dates Identified, Completed and Finalized
  - Fraud, Waste or Abuse
  - Comments

- Recovery Information (In Period & Total)
  - Reviewed Amount
  - **Identified Amount**
  - Settlement Amount
  - Void Amount
  - Offset Amount
  - Cash Amount
  - Recovered Amount
  - Refund Amount

- The reviews included on the PIR are broken into two review types:
  - Individual Provider Reviews
  - Multiple Provider Reviews

This distinction is to accommodate those reviews where the MLTC is performing data analysis of their provider network for such issues as duplicate payments or payments on claims for services to a deceased member, among others.

There are required fields depending on the review type, individual or multiple provider review.

## **MLTC PIR Training**

### Next Steps:

- The MLTCs will receive a notice requesting contact information for their submitters and certifiers after this presentation.
- The submitters and certifiers will receive access to the PIR section of the Gateway.
- OMIG will provide a virtual training and guidance document for MLTC staff.
- OMIG staff will be available for any questions from the MLTCs as they complete their report.
- MLTCs will submit their first reports by June 30, 2025.
- OMIG staff will review and provide feedback. The MLTCs will be allowed to resubmit their report if needed.

## Questions

• Questions from the MLTC can be directed to the <a href="mmcreporting@omig.ny.gov">mmcreporting@omig.ny.gov</a> shared mailbox.