



Office of the
Medicaid Inspector
General

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Managed Care Organization Annual Program Integrity Report Reporting Instructions

I. Background

The March 1, 2014 Model Medicaid Managed Care/Family Health Plus/HIV Special Needs Plan Model Contract (Contract) at section 18.5 a) xix) provides:

The Contractor [Managed Care Organizations (MCOs)] shall conduct an annual assessment and submit to OMIG an annual report, in a form and format to be determined by SDOH and OMIG, of the status of their conformity with all Contractor regulatory and contractual Medicaid program integrity obligations (list to be developed by SDOH and OMIG) by December 31 of each calendar year.

The New York State Department of Health (SDOH) and the New York State Office of the Medicaid Inspector General (OMIG) have finalized the form and format for the MCOs' annual report and have completed the list of program integrity obligations.

II. Program Integrity Assessment

The Center for Medicare and Medicaid Services (CMS) issues guidance to promote continuity and consistency of the Medicaid Integrity Program (MIP). The MIP Manual issued by CMS, serves as a reference tool to assist State Medicaid officials, providers, and health care organizations in program integrity matters.

According to the CMS MIP Manual (Rev. 1, Issued: 09-23-11), Medicaid integrity is defined as:

Planning, prevention, detection, and investigation/recovery activities undertaken to minimize or prevent overpayments due to Medicaid fraud, waste, or abuse.

<http://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/mpi115c17.pdf>

Consistent with CMS's definition of Medicaid integrity, the list below is what DOH and OMIG determine are program integrity areas to be assessed in accordance with the Contract:

- planning,
- prevention,
- detection, and
- investigation/recovery activities,

as they relate to the prevention or detection of Medicaid fraud, waste, and abuse.

MCOs may already have processes in place for assessing these areas of their operations related to their program integrity requirements under Title 42 of the Code of Federal Regulations § 438.608 (42 CFR 438.608) and their compliance program obligations under New York State Social Services Law § 363-d (SSL 363-d) and Title 18 of the New York Codes, Rules, and Regulations, § 521.3 (18 NYCRR 521.3).

The Contract requires an annual assessment of all regulatory and contractual program integrity obligations. However, OMIG recommends that MCOs develop and implement a process for conducting quarterly assessments to best position themselves to complete and submit the MCO Annual Program Integrity Report in December.

The MCO Annual Program Integrity Report form addresses activities related to the four areas outlined above.

III. Reporting Requirement

During the month of December each year, beginning in December 2016, MCOs must submit electronically, a report to OMIG, on the results of their annual assessment of their regulatory and contractual program integrity obligations.

1. MCO Annual Program Integrity Report Form

Each year OMIG will post the MCO Annual Program Integrity Report form on its website. MCOs must access the form on OMIG's website and download it. The form must be completed according to the instructions on

the form and in accordance with OMIG guidance. Likewise, the completed form must be submitted in accordance with OMIG requirements. MCOs will need to:

- a. Answer “yes” or “no” to each question on the form by clicking the box next to the appropriate response.
- b. Provide narratives in the text fields where appropriate.
- c. Complete the embedded Excel spreadsheets. Important note: You will need to scroll to the right to be sure that you complete all fields in the spreadsheet.
- d. Finalize the MCO Annual Program Integrity Report by approval and signature from the MCO’s Chief Executive Officer, Chief Operating Officer or most senior officer within the MCO with the responsibility for managing the product(s) offered by the MCO under the Contract.

2. Report Naming Convention and Submission Requirements

To enable an efficient review of the MCO Annual Program Integrity Report, OMIG requires the Report and supporting documents, if any, to be submitted according to OMIG’s defined organizational method.

Only electronic submissions will be accepted. All electronic files submitted in response to the MCO Annual Program Integrity Report should be named according to the following naming convention.

- a. Naming the MCO Annual Program Integrity Report form - The completed MCO Annual Program Integrity Report form must be named to include the name of the MCO making the submission and year of the report. The completed MCO Annual Program Integrity Report form must be named: “[MCO Name] [4 digit Year] PI Report.”
- b. Submitting in Searchable Format - All electronic files submitted must be submitted in a searchable format.
- c. Submitting the Report Electronically - The following steps should be taken to submit the MCO Annual Program Integrity Report:
 - i. Submissions should be sent via electronic mail (email) through a secure file transfer service. OMIG will identify the email address and the secure file transfer service to be utilized. This information will be communicated prior to the December reporting period.

- ii. The email subject line should indicate the MCO name, 4 digit year, and Program Integrity Report, e.g., MCO's Name 2016 Program Integrity Report.
- iii. The body of the email should include the name, title, phone number and email address of the contact person at the MCO that all MCO Annual Program Integrity Report correspondence should be directed to.
- iv. The sender shall request and obtain confirmation of receipt of all email submissions including confirmation of receipt of any attachments.

Submissions that are not complete or appropriately submitted will be rejected; MCOs will be required to correct and resubmit the report within 5 business days.