



# CMS Medicaid Program Integrity Strategy

## State Impacts and Expectations

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## Agenda



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Brad Hart



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- The Medicaid Challenge
- The Program Integrity (PI) Stigma
- PI Can Be Part of the Solution
- Principles of the CMS Medicaid PI Strategy
- Key Initiatives in the Strategy
- Shifting Risk to the States
- CPI Sessions on Medicaid PI
- States Can Learn from the Strategy



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# Challenge

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## The Medicaid Challenge

**State Medicaid Agencies (SMAs) are expected to:**

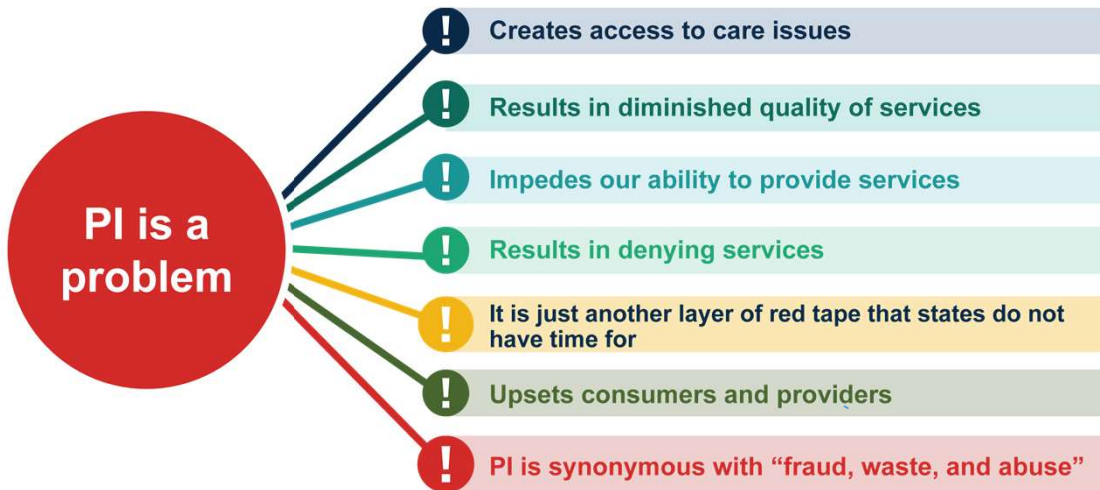
- Innovate service delivery
- Reduce or slow the overall spend
- Streamline access to care
- Improve coordination of services
- Focus on person-centered care
- Enhance quality monitoring
- Comply with those aforementioned mandates
- Respond to stakeholders (CMS, state legislature, auditors, etc.)
- Work with staff and resource constraints



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## The PI Stigma



## PI Can Be Part of the Solution

### PI helps SMAs accomplish their mission:

- Serve more consumers
- Improve quality of care
- Offer new and innovative services
- Contain costs
- Streamline processes
- Comply with mandates
- Resist unreasonable stakeholder demands more effectively





## PI Can Be Part of the Solution (cont.)

Action	Outcome
Increasing cost avoidance and recoveries	More money for services
Streamlining processes	Happier consumers and providers
Innovating services	Better outcomes
Keeping out bad actors	Less risk of patient harm
Containing costs	Less taxpayer resources required



# Strategy



## Key Initiatives in the Strategy



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- A stylized illustration of a team of five people (three men and two women) working together around a large, glowing yellow lightbulb. The lightbulb is the central focus, with rays emanating from it. The team members are seated at a long table, each with a laptop. One man is standing and pointing at a laptop screen. The scene is set against a white background with a large, stylized yellow lightbulb in the center. The overall theme is collaboration and innovation.

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## Shifting Risk to the States

- Risk of significant financial disallowances with heightened scrutiny of financial claiming
- Increased state auditor activity
- Potential for consumer eligibility audits
- Publication of PERM error rates may be on the horizon
- Potential for financial penalties due to TMSIS data quality issues
- Managed care final rule implementation may be a future audit or PI review target

## CPI Sessions on Medicaid PI

### Tuesday

9:30 a.m. | Provider screening and enrollment – Center for Program Integrity (CPI) Provider Enrollment and Oversight Group (PEOG)

### Wednesday

8:00 a.m. | CMS CPI updates and collaborative approaches – Alec Alexander

8:45 a.m. | Leveraging CMS for PI leads – CPI Investigations and Audits Group (IAG)

11:15 a.m. | Medicaid Eligibility Quality Control (MEQC) program and Payment Error Rate Measurement (PERM) corrective action plans (CAPs) – CPI Governance Management Group (GMG)






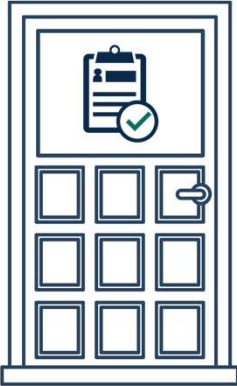
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## States Can Learn from the Strategy


The three “front doors” are critical and worth your attention:




**Financial management**



**Consumer eligibility**



**Provider screening and enrollment**

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## States Can Learn from the Strategy (cont.)

- PI needs to be foundational when expanding Medicaid – previously described controls for providers and consumers
- Some providers just need education to correct improper behavior, not an investigation
- The managed care final rule can help with managed care oversight. It contains program integrity provisions around fraud referrals, overpayments, data, reporting, screening and enrollment, and more.
- Use PERM and Medicaid Eligibility Quality Control (MEQC) program to your advantage
  - ✓ PERM corrective action plans should get to the root cause of improper payments and be implemented
  - ✓ MEQC can help you find and correct eligibility deficiencies on your own terms before they become PERM findings



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## States Can Learn from the Strategy (cont.)

**Data is great, if states...**



emphasize data quality



use data to find/prioritize actionable leads



use data to measure performance of PI activities



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## States Can Learn from the Strategy (cont.)

- PI should get involved in new areas
- Communicate with the Center for Medicaid and CHIP Services and the Office of Financial Management
- Take advantage of opportunities at the Medicaid Integrity Institute to discuss these initiatives with CMS partners and share best practices with your state colleagues
- Consider joining the Healthcare Fraud Prevention Partnership to leverage Medicare and commercial data to help you with Medicaid PI



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Questions?

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## For more information



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