


March 10, 2017

Analysis of the FY' 17 Office of the Inspector General (OIG) Work Plan

Valda Clark Christian and Cecil McCarthy


1



OIG FY '17 Work Plan

- Overview & Key Elements
- New CMS Provider Reviews & Activities
- Integration Into Annual Risk Management and Entity Work Plan Development

2



OIG FY '17 Work Plan Overview & Key Elements

- HHS OIG is the largest IG office in the Federal Govt.
- OIG's mission – to protect the integrity of HHS programs and the health and welfare of program beneficiaries.

3

**OIG FY '17 Work Plan
Overview & Key Elements**

The Mission is Accomplished Through:

- A nationwide network of audits, investigations, and evaluations
- Outreach, compliance, and educational activities
- Professional standards established by the GAO, DOJ, and IG community

4

**OIG FY '17 Work Plan
Overview & Key Elements**

The Mission is Accomplished Through:

- The Office of Audit Services (OAS)
- The Office of Evaluations and Inspections (OEI)
- The Office of Investigations (OI)
- The Office of Counsel to the Inspector General (OCIG)
- Executive Management (EM)

5

**OIG FY '17 Work Plan
Overview & Key Elements**

HHS Divisions Served by OIG's 2017 Work Plan:

1. Administration for Children and Families (ACF)
2. Administration for Community Living (ACL)
3. Centers for Disease Control and Prevention (CDC)
4. Centers for Medicare and Medicaid (CMS)
5. Food and Drug Administration (FDA)
6. Health Resources and Services Administration (HRSA)
7. Indian Health Service (IHS)
8. National Institutes of Health (NIH)
9. Substance Abuse and Mental Health Services Administration (SAMSHA)

6

**OIG FY '17 Work Plan
Overview & Key Elements**

Approximately 78% of OIG's funding in 2016 was directed toward oversight of CMS programs

7

**OIG FY '17 Work Plan
Overview & Key Elements**

Work Plan Drivers:

- Risk assessment to set priorities
- Legal and regulatory review mandates
- Congressional, HHS management, and OMB requests
- Work performed by other oversight agencies
- HHS management actions to implement OIG recommendations
- Potential for positive impact
- Top HHS management and performance challenges

8

**OIG FY '17 Work Plan
Overview & Key Elements**

Top management and performance challenges can be found at:

<http://oig.hhs.gov/reports-and-publications/top-challenges/index.asp>

9

**OIG FY '17 Work Plan
New Reviews & Activities**

Medicare Parts A & B – Hospitals:

- Hyperbaric Oxygen Therapy Services
- Incorrect Medical Assistance Days Claimed by Hospitals
- Inpatient Psychiatric Facility Outlier Payments
- Case Review of Inpatient Rehabilitation Hospital Patients Not Suited for Intensive Therapy

10

**OIG FY '17 Work Plan
New Reviews & Activities**

Medicare Parts A & B – Nursing Homes:

- Skilled Nursing Facilities – Unreported Incidents of Potential Abuse and Neglect
- Skilled Nursing Facility Reimbursement


11

**OIG FY '17 Work Plan
New Reviews & Activities**

Medicare Parts A & B – Hospices:

- Medicare Hospice Benefit Vulnerabilities and Recommendations for Improvement: A Portfolio
- Review of Hospices' Compliance with Medicare Requirements
- Hospice Home Care – Frequency of Nurse On-Site Visits to Assess Quality of Care and Services


12



OIG FY '17 Work Plan
New Reviews & Activities
Medicare Parts A & B – Home Health Services:

- Comparing HHA Survey Documents to Medicare Claims Data


13



OIG FY '17 Work Plan
New Reviews & Activities
Medicare Parts A & B – Medical Equipment & Supplies:

- Positive Airway Pressure Device Supplies – Supplier Compliance with Documentation Requirements for Frequency and Medical Necessity


14



OIG FY '17 Work Plan
New Reviews & Activities
Medicare Parts A & B – Other Providers & Suppliers:

- Medicare Payments for Transitional Care Management
- Medicare Payments for Chronic Care Management


15



OIG FY '17 Work Plan
New Reviews & Activities
Medicare Part D – Prescription Drug Program

- Questionable Billing for Compounded Topical Drugs in Part D
- Medicare Part D Payments for Service Dates After Individuals' Dates of Death


16



OIG FY '17 Work Plan
New Reviews & Activities
Medicaid – Prescription Drug Reviews

- States' MCO Medicaid Drug Claims


17



OIG FY '17 Work Plan
New Reviews & Activities
Medicaid – Delivery System Reform

- Accountable Care in Medicaid

18




**OIG FY '17 Work Plan
New Reviews & Activities**

Medicaid – Managed Care

- Health-Care-Acquired Conditions – Medicaid Managed Care Organizations


19



**OIG FY '17 Work Plan Integration into
Annual Entity Risk Management**

- “Effective” compliance programs are able to document a risk assessment process designed for the scope and complexity of the organization. (OIG Standard (See, 70 FR 4875 (January 31, 2005); See also, USSG §8B2.1)
- The OIG expects that the risk assessment should include documentation that spells out a reasoned approach to how compliance risks are identified and prioritized.

20



Enterprise Risk Management

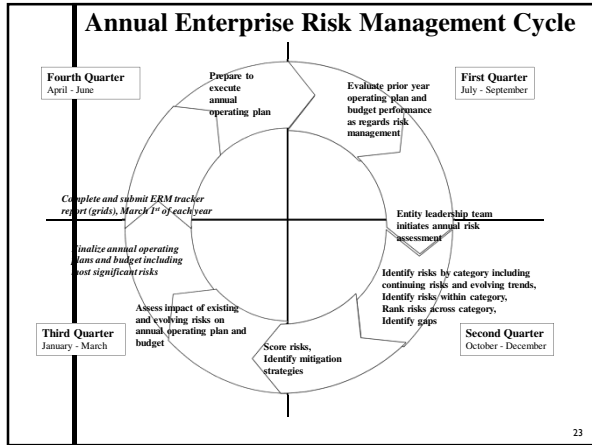
- Enterprise Risk Management (ERM) is our approved tool for assessing and managing risk across the enterprise.
- Individual entities and Health System leadership utilize the ERM data to identify, assess, prioritize, monitor and track (1) risks and (2) success of mitigation strategies.

21

Enterprise Risk Management, cont'd

- ERM assesses five categories of risk.
 - Financial
 - Technology
 - Regulatory/Legal
 - Strategic
 - Operations
- The Regulatory/Legal category includes our annual compliance risk assessment.

22



Approach to Risk Identification


Internal Review

- Review of System ongoing initiatives, business processes and other programs.
 - Prior Risk Assessments, Investigations and Work Plans
 - Strategic Priorities
 - Hotline Reports
 - Control Mechanisms
 - Interviews

External Review

- Review of current and/or emerging state and Federal regulatory environment.
 - The Centers for Medicare and Medicaid Services
 - The National Institutes of Health
 - The DHHS Office of the Inspector General (*The Work Plan*)
 - The Food and Drug Administration
 - The Office for Civil Rights
 - The Department of Justice

24



OIG FY '17 Work Plan

Available at <http://oig.hhs.gov/reports-and-publications/workplan/index.asp>

28
