2018 Reporting Instructions

1. Report Form Location and Submission Instructions

The Annual Program Integrity Report is available through the Heath Commerce System (HCS).

To get to the form, log in to HCS. In the top toolbar on the homepage, click the drop down menu arrow next to My Content, and click on All Applications. Click on the "M" and then MCO Reports to DOH/OMIG Submission Page.

On the MCO Reports to DOH/OMIG Submission Page you will see a section named Managed Care Annual Program Integrity Report. Within that section is a link to the form and an upload button to submit the form.

2. Guidance to Completing the Report

a. Complete the form according to the instructions within the form.

b. Reporting Period- The report should include complete information for the calendar year associated with the report. For example, the 2018 Annual Report should include information on Plan activities and operations between January 1, 2018 and December 31, 2018.

c. Report Due Dates- The report may be submitted between January 1 and January 31, but must be received by January 31st each year.

d. Report Naming Convention- To enable an efficient review of the Annual Program Integrity Report, OMIG requires the Report and supporting documents, if any, to be named according to the following naming convention:
   i) Name the completed Annual Program Integrity Report form with the Plan name and year of the report e.g., "[Plan Name] [4 digit Year] PI Report."
   ii) Name any attachments with report name and the question number the attachment corresponds to e.g., "[Plan Name] [4 digit Year] PI Report_Q5a."

e. Submitting in Searchable Format – All files must be submitted **electronically** as a filled, saved copy of the PDF form. Printed and scanned versions will not be accepted. Paper forms will not be accepted. This document requires Adobe Acrobat Reader 10.0 or higher, available free of charge at https://get.adobe.com/reader/otherversions/.

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

Please direct questions regarding the report and/or submission process to mcopireport@omig.ny.gov.

3. Guidance to Conducting the 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. Chapter 17, page 6 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.

Plans 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 Plans develop and implement a process for conducting quarterly assessments to position themselves to be able to complete the Annual Program Integrity Report and submit it timely.

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