Introduction: The Oregon Health Authority (OHA) is responsible for monitoring compliance with the terms and conditions of the Coordinated Care Organization (CCO) contract and all applicable rules and laws by Exhibit B, Part 9 – Program Integrity. The OHA Office of Program Integrity (OPI) will utilize this review tool to evaluate the following contract deliverables:

|  |  |  |
| --- | --- | --- |
| Deliverable | Contract Citation | Due Date |
| 2023 Quarterly Fraud, Waste and Abuse (FWA) Audit Reports | [Ex. B, Part 9, Sec. 17, Para. b (2)](https://www.oregon.gov/oha/HSD/OHP/CCO/2023-CCO-Contract-Template.pdf%20#page=165) | 30 days following the end of each calendar quarter |
| 2023 Annual FWA Audit Report | [Ex. B, Part 9, Sec. 17, Para. b (1)](https://www.oregon.gov/oha/HSD/OHP/CCO/2023-CCO-Contract-Template.pdf#page=165) | January 31 of each Contract Year |
| 2023 Quarterly FWA Referrals and Investigations Reports | [Ex. B, Part 9, Sec. 17, Para. c (2)](https://www.oregon.gov/oha/HSD/OHP/CCO/2023-CCO-Contract-Template.pdf#page=165) | 30 days following the end of each calendar quarter |
| 2023 Annual FWA Referrals and Investigations Report | [Ex. B, Part 9, Sec. 17, Para. c (1)](https://www.oregon.gov/oha/HSD/OHP/CCO/2023-CCO-Contract-Template.pdf#page=165) | January 31 of each Contract Year |

The OHA OPI’s evaluation results will be provided to your CCO via the CCO Contract Deliverables [portal](https://oha-cco.powerappsportals.us/). Your CCO’s Contract Administrator, Compliance Officer (CO), and anyone else in your CCO who has a portal account will receive an automated notice when the evaluation results letter and the results themselves are available in the portal (delivery of the letter and results via the portal serves as Administrative Notice as described in the contract). The results letter will indicate whether the deliverable has been approved. If it has not, then the letter will include the deadline for resubmission. You should download the letter and results from the portal; you will not receive them by email.

Review plan: OHA OPI will use ‘compliant’ and ‘non-compliant’ criteria to review compliance with the Quarterly and Annual FWA Audit and FWA Referrals and Investigations Report requirements.

Review process: OHA OPI will use the process in CCO Contract Exhibit D, Section 5 – Correction of Deficient Documents to approve or disapprove your CCO’s deliverables.

**Instructions:** FWA deliverables for Q2 CY 2023 or later must be submitted via the CCO Contract Deliverables [portal](https://oha-cco.powerappsportals.us/).Before submitting each FWA deliverable, check that it is complete and the data in each report meet the minimum requirements. See workbooks “Information about this report,” “Line by Line Field Definitions,” and “Instructions” in the FWA Audit Report and FWA Referrals and Investigations Report templates for additional information about the data required within each report and the final PI Audit reports. Upon receipt of OHA’s Administrative Notice via the portal, Contractor must remedy each deliverable as directed by OHA.

If you have questions about this document or about OHA’s review process, please contact the OHA OPI at [Caleb.Richards@oha.oregon.gov](mailto:Caleb.Richards@oha.oregon.gov) or [Allison.m.Tonge@oha.oregon.gov](mailto:Allison.m.Tonge@oha.oregon.gov).

*Note*: As a reminder, the following deliverables are reviewed through a separate process involving [Health Services Advisory Group (HSAG)](https://www.hsag.com/en/myoregoneqro/fraud-waste-and-abuse-reviews/): FWA Prevention Handbook, Annual FWA Prevention Plan, and Annual FWA Assessment Report.

Choose an item.

CCO documents submitted for OHA OPI Review

For each FWA deliverable, the CCO must complete the green sections below, adding rows to the table as needed to list all files submitted to OHA OPI for review. Files submitted must be the CCO’s current version.

|  |  |  |  |
| --- | --- | --- | --- |
| **Document Title** | **Document Owner** | **Date** | **Date of Receipt**  *(for OHA Use only)* |
| ***FWA Audit Report*** | ***CO Name*** | ***XX/XX/XXXX*** |  |
| ***FWA Referrals and Investigations Report*** | ***CO Name*** | ***XX/XX/XXXX*** |  |
| ***Final Program Integrity (PI) Audit report #*** | ***CO Name*** | ***XX/XX/XXXX*** |  |
| ***Final Program Integrity (PI) Audit report #*** | ***CO Name*** | ***XX/XX/XXXX*** |  |

## **Contractor’s FWA Annual and Quarterly Audit Reports and Referrals and Investigations Reports**

Using the templates provided by OHA on the CCO Contract Forms [Website](https://www.oregon.gov/oha/HSD/OHP/Pages/CCO-Contract-Forms.aspx), and in accordance with Contractor’s FWA Prevention Handbook and Annual FWA Prevention Plan, Contractor must provide OHA with quarterly and annual Reports of all PI Audits performed and all cases investigated (2023 CCO Contract [Ex. B, Part 9, Sec. 17, Paras. b & c](https://www.oregon.gov/oha/HSD/OHP/CCO/2023-CCO-Contract-Template.pdf#page=165)).

* The Annual and Quarterly FWA Audit Report must include all data points listed in the template, information on any provider overpayments that were recovered, the source of the provider overpayment recovery, and any sanctions or corrective actions imposed by Contractor on its subcontractors or providers. Contractor must report all PI Audits opened, in-process, and closed during the reporting period. Contractor must also provide to OHA with each Quarterly FWA Audit Report a copy of the final PI Audit report for each PI Audit identified in the Report as closed during the reporting quarter.
* The Annual and Quarterly FWA Referrals and Investigations Report must include all Contractor’s open and closed preliminary investigations of suspected and credible cases and, regardless of Contractor’s own suspicious or lack thereof, any incident with any of the characteristics listed in [Sec. 16 of Ex. B, Part 9](https://www.oregon.gov/oha/HSD/OHP/CCO/2023-CCO-Contract-Template.pdf#page=164).

In addition to the annual and quarterly summary of FWA Referrals and Investigations, Contractor must report (i.e., refer) all suspected cases of FWA including suspected Fraud committed by its employees, participating providers, subcontractors, members, or any other third parties to OHA OPI and DOJ’s Medicaid Fraud Control Unit (MFCU). Reporting (i.e., referral) must be made promptly but in no event more than seven (7) days after the Contractor is initially made aware of the suspicious case. All reporting must be made as set forth in Paras. h & i of Ex. B, Part 9, Sec. 17 (2023 CCO Contract [Ex. B, Part 9, Sec. 17, Para. d](https://www.oregon.gov/oha/HSD/OHP/CCO/2023-CCO-Contract-Template.pdf#page=165)).

In general, a final PI Audit report is a document that not only reflects any audit findings or variances it is also used to summarize the original intent of the audit and outline that scope. The report may also be used to propose the next course of action or a follow up time period. Each CCO will follow its organization’s policies and procedures to create a final PI Audit report. A final PI Audit report summarizes:

* the focus and time period of the PI Audit
* the PI Audit methodology, scope or universe of claims/encounters reviewed and any specific codes reviewed in the PI Audit
* findings/overpayment amount
* action(s) taken or audit resolution/conclusion (e.g. technical assistance/education of the provider or communications sent to the provider).

Compliance Review

1. **Reporting Activities:**

Number of complaints of suspected FWA referred to the OHA OPI or the MFCU that warrant a preliminary or full investigation; and for each matter that warrants investigation or PI Audit, the following:

1. Provider name and ID number; or Member Name and Member ID number
2. Source of the complaint
3. Type of Provider
4. Nature of the complaint
5. Approximate dollars involved
6. Legal and administrative disposition of the case

*NOTE: All data in these reports must be specific to CCO’s Medicaid managed care contract.*

*NOTE: CCO must complete all data fields in the Annual and Quarterly FWA Audit Report and FWA Referrals and Investigations Report templates; including those data fields that summarize the legal and administrative disposition of the case: overpayments recovered, the source of the provider overpayments recovered, and any sanctions or corrective actions imposed by CCO on its subcontractor(s) or provider(s).*

|  |  |
| --- | --- |
| OHA OPI Review: | Compliant |
| Not Compliant |

1. **Contractor must use templates provided by OHA to report annually and quarterly.**

CCOs must provide copies of completed templates for OHA review of this requirement.

Templates developed by OHA for CCO quarterly and annual FWA Audit and FWA Referrals and Investigations reporting are posted on OHA’s CCO Contract Forms Website: <https://www.oregon.gov/oha/HSD/OHP/Pages/CCO-Contract-Forms.aspx>

1. template/report is complete and accurate
2. referrals were made and are accurately reported in the template/report
3. referrals were made within 7 days, when required by Ex. B, Part 9, Sec. 17

|  |  |
| --- | --- |
| OHA OPI Review: | Compliant |
| Not Compliant |

1. **Contractor copies of final PI Audit Reports**

Contractor must provide to OHA with each Quarterly FWA Audit Report a copy of the final PI Audit report for each PI Audit identified in the Report as closed during the reporting period.

1. Each PI Audit reported by CCO as closed in the reporting period must have a final PI Audit report. If the PI Audit report is not finalized, CCO must add a note on the Annual FWA Audit Report in Column Z, workbook Q# Details, that the final PI Audit report is pending and provide an anticipated date of completion.
2. OHA will follow up with Contractor on any outstanding final PI Audit reports and the content of individual final PI Audit report(s), as needed.

*NOTE: CCO must provide to OHA a copy of the final PI Audit report for each PI Audit identified in the Report as closed during the reporting period. Each final PI Audit report must have detailed information and data specific to each closed PI Audit.*

|  |  |
| --- | --- |
| OHA OPI Review: | Compliant |
| Not Compliant |