

## SMP Performance Measure Definitions

This document provides definitions and guidance about the SMP Performance Measures (PMs) to help you accurately report your SMP activities using the SMP Information and Reporting System (SIRS). This guidance will be updated regularly based on SMP questions and feedback.

Performance Measure	Definition
1. Active SMP Team Members	Individuals who spent any time on the SMP program, including SMP-paid, in-kind paid, and volunteer team members.
2. SMP Team Member Hours	Hours contributed by team members while performing SMP work and receiving training to perform SMP work, including time spent by SMP-paid, in-kind paid, and volunteer team members.
3. Group Outreach and Education Events	Community outreach events, education activities, and presentations to educate beneficiaries, family members, caregivers, and others about SMP services and detecting health care fraud, errors, and abuse.
4. People Reached Through Group Outreach and Education Events	Total estimated number of people reached as a result of SMP group outreach and education activities.
5. Individual Interactions	Individual interactions between SMP team members and beneficiaries, family members, caregivers, or others for the purpose of discussing or gathering information about potential health care fraud, errors, or abuse.
6. Cost Avoidance	Health care expenditures for which the government, a beneficiary, or other entity (e.g., secondary health insurer or a pharmacy) was relieved of responsibility for payment as a result of the SMP program.
7. Medicare Recoveries	Actual and expected Medicare recoveries from criminal actions, settlements, civil judgments, or overpayments that resulted from the referral. This applies to the amount of money that was ordered or agreed upon to be returned to Medicare, and may not reflect actual collections. Recoveries may also involve cases that include participation by a Medicare contractor or a law enforcement agency.

<b>Performance Measure</b>	<b>Definition</b>
8. Medicaid Recoveries	Actual and expected Medicaid recoveries from criminal actions, settlements, civil judgments, or overpayments that resulted from the referral. This applies to the amount of money that was ordered or agreed upon to be returned to Medicaid, and may not reflect actual collections. Recoveries may also involve cases that include participation by a Medicaid Fraud Control Unit or a law enforcement agency.
9. Savings to Beneficiaries	Money saved by or recouped to an individual as a result of the SMP project (e.g., copayments, deductibles, or any other out-of-pocket expenses).
10. Other Savings	Money saved or recouped to an entity other than Medicare, Medicaid, or a beneficiary (e.g., secondary health insurer) as a result of the SMP program.

## SMP Performance Measure Guidance

### PM 1: TOTAL NUMBER OF ACTIVE SMP TEAM MEMBERS

#### Who counts as an “active team member?”

Active SMP team members include all individuals who spent any time on the SMP program during a given time period, regardless of whether they received compensation for their time or services. To be considered active, a team member must have contributed work hours, training hours, or both during the reporting period. If a team member was simply enrolled with your SMP, but did not spend any time on the program, they do not count for the OIG report.

#### Do paid staff members count as “active team members?”

Yes. You may have SMP team members with different paid statuses, including those who are true volunteers, those who are paid by the SMP, and those who are paid by another program or organization (“in-kind paid”). All of these individuals are SMP team members and should report their SMP hours and activities so they can be included on the OIG report.

- Volunteer Team Members: Individuals who do not receive paid compensation for their time or services, but may receive travel reimbursement for SMP activities.
- SMP-Paid Team Members: Individuals who receive any compensation for their time and services from the SMP, regardless of whether their salary was funded by the SMP grant directly or other funding provided by the SMP grantee.
- In-Kind Paid Team Members: Individuals who receive compensation for their time and services from a program or organization other than SMP.

Note: You can indicate the paid status of your team members on their Team Member Profile page in SIRS.

#### Does this mean we should report the hours that paid staff members spend on SMP?

Yes. Please report the time these individuals spend on SMP activities using the “Time Spent” fields on the Individual Interaction Form, Group Outreach and Education Form, and Media Outreach and Education Form. Any other hours they spend on the SMP program can be reported using the Team Member Activity Form.

### PM 2: TOTAL NUMBER OF SMP TEAM MEMBER HOURS

SMP team member hours include the total amount of time contributed by team members while performing SMP work or receiving training to perform SMP work. Team member work hours and training hours are no longer separated for the OIG report; these hours are all included in PM 2.

SMP team member hours include all time spent on Individual Interactions, Group Outreach and Education, Media Outreach and Education, and other activities that support the SMP program,

including administrative and program management activities. The time you spend on SMP activities may be reported on different forms, depending on the type of activity you complete:

- **Individual Interaction Form:** You can use the “Time Spent” field to record the amount of time you spend on an Individual Interaction with, or on behalf of, a beneficiary. This includes the time you spend counseling, researching, referring, advocating, waiting to meet with a beneficiary, traveling to meet a beneficiary, preparing materials for a beneficiary, and completing paperwork or forms to document the interaction.
- **Group Outreach and Education Form:** You can use the “Time Spent” field to record the amount of time you spend on a Group Outreach and Education event, including preparation time, travel time, and the time spent during the activity itself.
- **Media Outreach and Education Form:** You can use the “Time Spent” field to record the amount of time you spend on a Media Outreach and Education activity, including preparation time, travel time (if applicable), and the time spent on the activity itself.
- **Team Member Activity Form:** You can use this form to report time spent all other SMP activities, such as the time you spend delivering, attending, or traveling to SMP-related training, distributing or disseminating information, completing administrative tasks, managing your SMP program, supervising SMP team members, and any other SMP-related activities not identified elsewhere.

#### **What happens if two or more team members spend time on the same SMP interaction?**

If more than one team member is assisting with an Individual Interaction, Group Outreach and Education activity, or Media Outreach and Education activity, only one person should submit an interaction form in SIRS. The person who submits the interaction form should include only their own time spent on the form. Any additional team member(s) should report their time using the Team Member Activity Form.

#### **What types of activities can be reported using the Team Member Activity Form?**

A variety of SMP-related activities may be recorded using the Team Member Activity Form, including:

- **Administrative Support:** Use this category to report any time spent on administrative activities such as data entry, copying, filing, mailing, or similar office work.
- **Distributing Information:** Use this category to report any time spent disseminating or distributing SMP information and resources to partner organizations or others in your community.
- **Group Outreach and Education:** Use this category to report any time spent preparing for SMP group outreach and education, in general (not related to a specific event). Please also use this category to report any time you spent on a specific Group Outreach and Education event that was (or will be) reported in SIRS by another SMP team member.

Please include any preparation time, travel time, and your time spent during the activity itself.

- **Individual Interactions:** Use this category to report any time spent preparing for SMP individual interactions, in general (not related to a specific interaction). Please also use this category to report any time you spent on a specific Individual Interaction that was (or will be) reported in SIRS by another SMP team member or to report any additional time you spent on a complex interaction that has already been entered into SIRS. Please include the time you spent counseling, researching, referring, advocating, waiting to meet with a beneficiary, traveling to meet a beneficiary, and preparing materials for a beneficiary.
- **Media Outreach and Education:** Use this category to report any time spent preparing for SMP media outreach and education, in general (not related to a specific media event). Please also use this category to report any time you spent on a specific Media Outreach and Education event that was (or will be) reported in SIRS by another SMP team member. Please include any preparation time, travel time (if applicable), and your time spent during the activity itself.
- **SMP Program Management / Team Member Management:** Use this category to report any time spent managing your SMP program and team members, including time spent overseeing your program, analyzing program results, preparing program reports, and supervising, mentoring, or meeting with SMP team members.
- **Training (Initial/Orientation):** Use this category to report any time spent preparing for, delivering, attending, or traveling to SMP initial training or orientation sessions.
- **Training (Update/Continuing Education):** Use this category to report any time spent preparing for, delivering, attending, or traveling to SMP-related update trainings or continuing education sessions.
- **Other SMP Activities:** Use this category to report time spent on any other SMP-related activities not categorized above.

#### **What other types of activities count toward PM 2?**

Time spent on SMP activities (e.g., events, counseling, etc.) may be counted even if no beneficiaries attend. In this case, any time spent may be reported on the Team Member Activity Form and counted using the appropriate category for the type of activity the team member was performing.

#### **PM 3: NUMBER OF GROUP OUTREACH AND EDUCATION EVENTS**

This performance measure includes the total number of community outreach events, education activities, and presentations to educate beneficiaries, family members, caregivers, and others about SMP services and detecting health care fraud, errors, and abuse. Examples include delivering group presentations, participating in health or senior fairs, staffing information

booths, and exhibiting at conferences. To count as a Group Outreach and Education activity, the event must be attended or staffed by an SMP team member.

### **What's the difference between a group education session and a community event?**

A group education session is a formal presentation led by an SMP team member to educate beneficiaries, family members, caregivers, and others about detecting fraud, errors, and abuse in the health care system and services offered by SMP.

A community event is an outreach or education activity conducted by an SMP team member that is not a formal presentation, but that still aims to educate the public about health care fraud prevention, detection, reporting, and the availability of SMP services. Examples of community events include participating in health or senior fairs, staffing information booths, and exhibiting at conferences.

### **What types of activities are not considered Group Outreach and Education events?**

Distributing or disseminating materials (e.g., leaving materials at a library, printing the SMP phone number on pharmacy bags, etc.) is not considered a Group Outreach and Education event. You may report your time spent on dissemination activities using the Team Member Activity Form, but these activities are not reportable for PM 3.

Electronic communications with SMP team members or other listservs are also not considered to be Group Outreach and Education activities, though they may be counted as electronic newsletters and reported on the Media Outreach and Education Form.

### **What about events that are conducted electronically?**

Events conducted electronically, such as webinars, teleconferences, tele-town halls, etc. may be counted as long as they include education about Medicare fraud, errors, or abuse, and/or the SMP program, and are interactive - meaning that participants have the opportunity to interact with the presenter and ask questions. For the number of participants, you can count everyone who was connected to or logged into the event.

### **If more than one SMP grantee is involved in an event, how should it be counted?**

It should be counted as only one event. The SMP whose population was the primary target for the event would be considered the "host-SMP." The "host-SMP" should be the one entering the data in SIRS, including the number of beneficiaries served, even if they reside outside of the host state.

## **PM 4: ESTIMATED NUMBER OF PEOPLE REACHED THROUGH GROUP OUTREACH AND EDUCATION EVENTS**

### **How do I estimate the number of people reached?**

For events that take place in person:

- Estimate the number of attendees by using sign-in sheets or by taking a rough head count of the number of people at the presentation or event.

- Estimate the number of people potentially reached by using a tick-mark for each person that approaches your booth to take materials and/or speak with an SMP team member or by counting the number of brochures/materials distributed. You should not automatically count the total event attendance as your estimate for the number of people reached.
- If, however, each participant at a conference or fair is given SMP information as part of their conference bag or materials (SMP flyers, brochures, etc.), the total number of participants at the event can be counted as the estimated number of people reached.

For events that are conducted electronically or via teleconference, count everyone who was connected or logged on.

## **PM 5: NUMBER OF INDIVIDUAL INTERACTIONS WITH, OR ON BEHALF OF, A MEDICARE BENEFICIARY**

This performance measure includes the total number of individual interactions between SMP team members and beneficiaries, family members, caregivers, or others for the purpose of discussing or gathering information about potential health care fraud, errors, or abuse. Individual interactions may include information sharing, counseling, investigation, and/or referrals to other agencies, as needed.

### **What types of interactions count toward PM 5?**

All reported individual interactions count toward PM 5, regardless of whether they are basic or complex interactions. Interactions used to be reported differently depending on whether they were categorized as simple inquiries, one-on-one counseling sessions, or complex issues. This distinction is no longer required and all individual interactions are reported under PM 5.

### **What kinds of interactions don't count toward PM 5?**

Interactions that are not related to the SMP mission should not be reported as Individual Interactions and may not be counted toward PM 5.

Meetings with partners to educate them about your SMP program do not count as Individual Interactions. These are partnership development activities and, while highly valuable, are not included in PM 5.

### **What about interactions that take place as part of a Group Outreach and Education Event?**

During a community event, conversations that provide general information available at the booth are not counted as individual interactions. These are included in the number of people reached by the event. However, questions at a community event that go beyond providing general information, such as helping a beneficiary review their MSN, are counted as separate individual interactions, in addition to counting the person as being reached by the event.

Interactions that occur after a group education session, separate from the presentation Q&A period, may also be counted in addition to the presentation.

### **What if my SMP shares a call-center or other SMP work with another program?**

There are many SMPs who work very closely with partner organizations to get SMP work done, such as through subcontracts. Sometimes an SMP and their partners are co-located under one roof and this can result in some SMPs' staff or volunteers wearing multiple hats -- a SHIP/SMP hat or an AAA/SMP hat, for example. If you wear multiple hats at your organization, you should be careful to sort and separate SMP vs. non-SMP calls and report accordingly. Interactions that are related to another program and that are not related to the SMP mission should not be reported in SIRS and do not count toward PM 5. For additional assistance, please see the *CMS/AoA Data Reporting Guidance: Joint SHIP/SMP Programs* located in the SMP Resource Library.

### **PM 6: COST AVOIDANCE ON BEHALF OF MEDICARE, MEDICAID, BENEFICIARIES, OR OTHERS**

Cost avoidance includes health care expenditures for which the government, a beneficiary, or other entity (e.g., secondary health insurer or a pharmacy) was relieved of responsibility for payment as a result of the SMP program.

All cost avoidance must be health care related:

- Based on SMP work, the provider or beneficiary was not subject to a payment.
- No actual payment was made (unlike with expected recoveries).

### **What is an example of cost avoidance?**

For example, a beneficiary contacts the SMP for guidance about a billing statement they were sent for a service they never received. The SMP instructs the beneficiary not to make that payment and offers to contact the provider to explain the concern. The provider acknowledges the billing error as their mistake and sends the beneficiary a revised billing statement.

### **What are some examples of acceptable documentation for PM 6?**

Examples of acceptable documentation include:

- Copy of original and revised billing statements showing a zero balance (e.g., from a hospital or physician's office)
- Letters from CMS contractors (e.g., ZPIC, PSC, MEDIC)
- Statement by OIG Hotline via ACL

### **PM 7: EXPECTED MEDICARE RECOVERIES ATTRIBUTIBLE TO THE PROJECTS**

This performance measure represents actual and expected Medicare recoveries from criminal actions, settlements, civil judgments, or overpayments that resulted from the referral. This applies to the amount of money that was ordered or agreed upon to be returned to Medicare, and may not reflect actual collections. Recoveries may also involve cases that include participation by a Medicare contractor or a law enforcement agency.



**When a CMS contractor or other federal entity identifies and confirms a Medicare overpayment, can it be counted toward PM 7?**

Yes. Identified overpayments should be included in PM 7. You do not have to wait for, or seek the results of, possible appeals.

**Do I need to verify that funds were actually returned to Medicare?**

No. In recent years, OIG has shifted the definition from “actual” to “expected” funds recovered.

**What are some examples of acceptable documentation for PM 7?**

Any Medicare expected recoveries must be verifiable, attributable to the project, and include the appropriate supporting documentation:

- Copy of the questionable Medicare Summary Notice (MSN), Explanation of Benefits (EOB), or other billing statement provided by the beneficiary or their representative, as well as a copy of a corrected MSN or EOB.
- Letter or email from a CMS representative or other entity in response to an SMP referral verifying that an overpayment was identified and specifying the amount.
- Copy of a cancelled check, corrected hospital billing statement, or letter or check from other provider types.

**PM 8: EXPECTED MEDICAID RECOVERIES ATTRIBUTIBLE TO THE PROJECTS**

This amount represents actual and expected Medicaid recoveries from criminal actions, settlements, civil judgments, or overpayments that resulted from the referral. This applies to the amount of money that was ordered or agreed upon to be returned to Medicaid, and may not reflect actual collections. Recoveries may also involve cases that include participation by a Medicaid Fraud Control Unit or a law enforcement agency.

**Do I need to verify that funds were actually returned to Medicaid?**

No. In recent years, OIG has shifted the definition from “actual” to “expected” funds recovered.

**What are some examples of acceptable documentation for PM 8?**

Any Medicaid expected recoveries must be verifiable, attributable to the project, and include the appropriate supporting documentation:

- Copy of the questionable MSN, EOB, or other billing statement provided by the beneficiary or their representative, as well as a copy of a corrected MSN or EOB.
- Letter or email from a Medicaid representative or other entity in response to an SMP referral verifying that an overpayment was identified and specifying the amount.
- Copy of a cancelled check, corrected hospital billing statement, or letter or check from other provider types.

## **PM 9: ACTUAL SAVINGS TO BENEFICIARIES ATTRIBUTABLE TO THE PROJECTS**

This amount includes money saved by or recouped to an individual as a result of the SMP project (e.g., copayments, deductibles, or any other out-of-pocket expenses).

### **What counts as “savings to beneficiaries?”**

Savings to beneficiaries should be health care related and include situations where a beneficiary received reimbursement for, or was relieved from paying for, a health care service or product for which he or she was not responsible due to fraud, errors, or abuse.

Recommending to beneficiaries that they enroll in plans or programs to save money is outside of the SMP program scope and is not considered “savings to beneficiaries” for the purposes of the OIG report.

### **What should I submit as documentation of beneficiary savings?**

Some examples of documentation include:

- An original bill/statement and a cancelled or corrected bill/statement
- A copy of a check for reimbursement of payment to the beneficiary

OR, for savings under \$100

- A signed statement from a beneficiary (or their caregiver/representative) is adequate supporting documentation, if other documentation is unavailable. The \$100 threshold applies to an individual complex interaction.

## **PM 10: OTHER SAVINGS ATTRIBUTABLE TO THE PROJECTS**

This amount includes money saved or recouped to an entity other than Medicare, Medicaid, or a beneficiary (e.g., secondary health insurer) as a result of the SMP program.

## **SMP MEDIA OUTREACH AND EDUCATION EVENTS**

Media Outreach and Education is no longer a performance measure included on the OIG report. However, it's still important to record your media activities to track your time spent, keep a historical record of your efforts to spread the word about SMP, and also help you track data you may need for other agency or grant reporting purposes.

### **What counts as a “media airing?”**

A media airing includes any individual airing or publishing of media (e.g., print, radio, television, or electronic) to educate individuals about Medicare fraud, errors, and abuse or SMP program services. For example:

- Newsletters, including those created by SMP and articles for other newsletters
- Print media, including articles or ads in newspapers, magazines, senior guides, other media outlets, and editorials
- Billboards
- Radio, including interviews and public service announcements (PSAs)
- Television, including interviews and PSAs
- Website postings
- Bus ads

### **How do I count media airings?**

You should count each documented time a media effort is aired or published. For example:

- Newsletter: Count the publication of the newsletter (print or electronic) as one airing.
- Print media, including newspapers, magazines, and other media outlets: Count the publication of the article, ad, interview, etc. as one airing per print media venue. For example, if the same ad appears in several different magazines, each magazine is considered an individual airing. Also, count a new airing each subsequent day print media is published, if applicable. For example, an advertisement appearing in a given newspaper for 7 days in a row is 7 airings.
- Radio or television: Enter the total number of individual airings for the media activity.
- Billboard or other outdoor signage: Count each day that an individual billboard is visible as one airing. To figure out how many airings you would have, multiply the number of billboards by the number of days visible. For example, if you have 2 billboards and each is up for 30 days that would be 60 media airings.
- Bus ad: Count each day that an advertisement is visible on an individual bus as one airing. To decide how many media airings you have, multiply the number of buses by the number of days the ad was posted on the bus. For example, 5 buses have the SMP advertising on them for 30 days each that would be 150 media airings.

- Website postings, including Facebook and Twitter: When articles or information that meets our definition of a media airing are posted to a website, it counts as one airing. There is one exception – when paid ads are web-based. Count paid web-based ads the same way you would count bus ads and billboards.

### **What doesn't count as a media airing?**

- Do not count posting videos on YouTube. This is a means to an end. Posting on YouTube enables easy posting of educational videos to websites. You can count the posting of that video to your website, but you can't count your upload to YouTube separately.
- Posters, banners, and displays used during Group Outreach and Education events should not be counted separately as media airings.
- Do not count the number of people in the audience or how many people are receiving the media (e.g., distribution of a newspaper, number of website hits or visitors). Remember, we're not counting the audience reached; we're counting airings.

### **How do I count airings of newspaper articles, PSAs, interviews, etc. that are subsequently re-posted on the publisher's website?**

Re-postings on the publisher's website can be counted as one additional airing, since it's a separate venue from print or a live event (even though it is the same article/ interview). You should count the day of posting as the day of airing. Do not count each subsequent day the article/interview remains live on the website as an additional airing. Articles can be left on websites for weeks, months or years, much the way newspapers in libraries are available indefinitely beyond their actual print date.

### **How do I count airing of paid educational advertising that is web-based?**

Count these the way you would count bus ads, billboards, and other paid print ads. For each documented day your ad appears on a given web-based media (such as a website), count one airing. If your ad is on multiple sites, count one airing per documentable day on the other site/s also. For example, a paid SMP educational ad appears on a single website for 31 days, which equals 31 airings.

### **What happens when there's national media coverage of SMP that airs in my state?**

You should not enter media airings related to national press. The exception is when your SMP team members or beneficiaries are interviewed by, or provide information to, a reporter from the national press as part of their story. You can count documented airings of the national press article if your SMP is featured in or contributed to the article.

### **If I hang posters or put up signs to market SMP, does this count as an airing?**

Maybe. It depends upon exposure. If the posters are indoor (e.g., bulletin boards), they do not count. If they're outdoor (e.g., yard signs, bus stops), they do count, if they fit the definition of media. You should count them using the billboard guidance.

**Can I count inclusions in community calendars (online or in print) in a newspaper that gives info about an upcoming SMP event?**

Yes, but only if it fits the definition of the purpose of SMP media – meaning it must be educational in nature. For example, it has to include more than just a date and time.

**Can I count ads seeking SMP volunteers on volunteer websites? If so, how?**

Yes, you can count it if it meets the definition of SMP media. You should count according to the guidance given for website postings.

**I share resources with my SMP team members through email updates, including educational materials about scams, webinars, etc. Is this an activity I can record in SIRS?**

Yes, you can report this activity in SIRS as a Media Outreach and Education activity. This would be considered an electronic newsletter, so you should count according to the guidance given for newsletters.