

Navigating the Maze

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OIG WORK PLAN



In the fall, most compliance officers are anxiously awaiting the updated Office of Inspector General (OIG) Work Plan. This document describes various projects that the OIG's Office of Audit Services and the Office of Evaluation and Inspections plan to undertake in the coming fiscal year. The OIG has published a Work Plan annually for approximately 20 years and in recent years began to publish mid-year updates.

These Work Plans serve as one of the resources that entities use to develop their internal audit plans. By using this resource, compliance officers can build a plan that is better aligned with the projects the OIG is pursuing in an effort to curb fraud and abuse. This year however, the OIG announced that in an effort to enhance transparency, updates would be posted monthly on their website.¹ These updates include new projects and the removal of completed projects. The OIG indicated that "This web-based Work Plan will evolve as OIG continues to pursue complete, accurate, and timely public updates regarding our planned, ongoing, and published work."²

The OIG plans their work by "...assessing relative risks in HHS programs and operations to identify those areas most in need of attention, and accordingly, to set priorities for the sequence and proportion of resources to be allocated."³ There are a number of factors that the OIG considers when identifying projects, such as those reviews that are mandated by laws, regulations, or directives; requests raised by Congress and other management offices; top management and performance challenges facing HHS; work performed by oversight organizations; management's actions to implement OIG recommendations from previous reviews; and the potential for positive impact.⁴

As of October 5, 2017, there were approximately 231 audits, evaluations, and inspections that were currently underway or planned by the various agencies that the OIG oversees.⁵ Since June, when the OIG implemented monthly updates, there have been 48 updated or revised projects posted on the website.

Below are those projects which have been listed in the monthly updates.

◆ **Administration for Children and Families**

- ◇ Review of Child Care and Development Fund Subsidy Payments in New York City
- ◇ Child Care and Development Fund: State Criminal Background Check Requirements

◆ **Centers for Disease Control and Prevention**

- ◇ CDC's Global Health Security Agenda

◆ **Centers for Medicare & Medicaid Services**

- ◇ Federal Marketplace Enrollment System
- ◇ Availability of Behavioral Health Services in Medicaid Managed Care
- ◇ Medicaid Health Home Services for Beneficiaries with Chronic Conditions
- ◇ Medicaid Nursing Home Life Safety Reviews
- ◇ Part D Sponsors Reporting of Direct and Indirect Remunerations
- ◇ Medicare Payments for Overlapping Part A Inpatient Claims and Part B Claims
- ◇ Duplicate Drug Claims for Hospice Beneficiaries





- ◇ Medicare Part B Payments for Psychotherapy Services
- ◇ Ventilation Devices: Reasonableness of Medicare Payments Compared to Amounts Paid in the Open Market
- ◇ Consumer-Directed Personal Assistance Program
- ◇ Health and Safety Standards in Social Services for Adults
- ◇ Medicare Part B Payments for Ambulance Services Subject to Part A Skilled Nursing Facility Consolidated Billing Requirements
- ◇ Assertive Community Treatment Program
- ◇ Children's Health Insurance Program Reauthorization Act (CHIPRA) Performance Bonus Payments Received by States
- ◇ High-Risk, Error-Prone HHA Providers Using HHA Historical Data
- ◇ Recovery of Federal Funds Through Judgements/Settlements
- ◇ Nationwide Medicare Electronic Health Record Incentive Payments to Hospitals
- ◇ Review of Medicare Payments for Nonphysician Outpatient Services Provided Under the Inpatient Prospective Payment System
- ◇ Medicaid Claims for Opioid Treatment Program Services
- ◇ Medicaid Targeted Case Management
- ◇ Review of Medicare Payments for Telehealth Services
- ◇ Medicare Payments for Unallowable Overlapping Home Health Claims and Part B Claims
- ◇ Medicare Payments for Unallowable Overlapping Hospice Claims and Part B Claims
- ◇ Review of Quality Measures Data Reported by Accountable Care Organizations in the Medicare Shared Savings Program

- ◇ Data Brief: Excessive Use of Opioids in Medicare Part D
- ◇ Including Non-Covered Versions When Setting Payment Amounts for Part B Drugs
- ◇ Follow-up: CMS's Management of the Quality Payment Program
- ◇ Trends in Hospice Deficiencies and Complaints
- ◇ Medicare Drug Integrity Contractor's Activities
- ◇ Invalid Prescriber Identifiers on Medicare Part D Drug Claims in 2016
- ◇ FDA-approval Status of Drugs in the Medicaid Drug Rebate Program
- ◇ Accuracy of Drug Classification Data Used to Collect Medicaid Rebates
- ◇ Reasonable Assumptions in Manufacturer AMP Reporting
- ◇ Monitoring Children Enrolled in Medicaid and Diagnosed with Attention Deficit Hyperactivity Disorder

◆ **Food and Drug Administration**

- ◇ Review of the Food and Drug Administration's Contract Closeout Actions

◆ **Health Resources and Services Administration**

- ◇ HRSA's Award Process for ZIKA Response and Preparedness Funds
- ◇ Services for American Indians and Alaska Natives Administered by a Federally Qualified Health Center

◆ **Indian Health Services**

- ◇ Case Study: Closure of the Rosebud Hospital Emergency Department

◆ **National Institutes of Health**

- ◇ NIH Compliance with Federal Requirements for Indirect Cost Rate Setting

◆ **Office of the Assistant Secretary for Administration**

- ◇ HHS Incident Response Capability

◆ **Other**

- ◇ HHS Resolution of Audit Recommendations

◆ **Other Public Health**

- ◇ Review of the Patient Safety Organization Program



◆ Substance Abuse and Mental Health Services Administration

- ◇ SAMHSA Pre-Award Process for Opioid State Targeted Response Grants
- ◇ **Controls Over Opioid Treatment Programs**
- ◇ Access to Buprenorphine-Waivered Providers for the Treatment of Opioid Use Disorder

Work Plan topics cover a wide-range of topics and will not be applicable to every organizations. Compliance Officers will need to review the details of each planned review and determine if their facility could be at risk for based on the scenario described and plan accordingly. The Work Plan should not be the only resource used to identify potential risks within an organization but it certainly should be included.

To assess this list or to obtain detailed information related to these reviews please visit the OIG Work Plan website at <https://oig.hhs.gov/reports-and-publications/workplan/active-item-table.asp>

¹ U.S Department of Health & Human Resources: Office of Inspector General. (n.d.) Work Plan. para 1 Available from <https://oig.hhs.gov/reports-and-publications/workplan/index.asp>

² Indem

³ Ibid. Ref #1 para 4

⁴ U.S Department of Health & Human Resources: Office of Inspector General. (n.d.) Active Work Plan Items. Available from <https://oig.hhs.gov/reports-and-publications/workplan/active-item-table.asp>

⁵ Indem

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