

Program Memorandum Intermediaries/Carriers

Department of Health and
Human Services (DHHS)
HEALTH CARE FINANCING
ADMINISTRATION (HCFA)

Transmittal AB-01-08

Date: JANUARY 25, 2001

This Program Memorandum re-issues Program Memorandum AB-00-70, Change Request 1143 dated August 7, 2000. The only change is the discard date; all other material remains the same.

CHANGE REQUEST 1143

SUBJECT: Program Safeguard Contractor for Corporate Integrity Agreements (PSC-CIA)

In the spring of 1999, HCFA awarded Indefinite Delivery, Indefinite Quantity (IDIQ) contracts to thirteen Program Safeguard Contractors (PSCs) to perform program integrity and data analysis activities as defined in specific task orders. Under the "umbrella" PSC contract, Request for Proposals (RFPs) for selected task orders are competed amongst the PSCs and awarded to one or more depending on the scope of each task order. The PSC-CIA task order was awarded in November, 1999 to Tri-Centurion, L.L.C.

The purpose of this Program Memorandum (PM) is to inform you of the workflow process you are to follow for the PSC-CIA. We want to ensure timely and efficient coordination between the PSC and our current carriers and fiscal intermediaries to maximize the successful outcome of this program integrity initiative.

The PSC-CIA shall perform on-site reviews of selected providers that are subject to CIAs to verify compliance efforts and confirm that the terms and conditions of the CIAs are being met. The PSC-CIA shall also review a statistically valid random sample (SVRS) of claims submitted to Medicare by the providers and determine patterns or significant occurrences where claims are filed in contravention of applicable Medicare laws, regulations or policies.

There are 27 CIAs scheduled for review this year. These 27 CIAs apply to providers serviced by various contractors. You may or may not be contacted, but if you are you may possibly be contacted more than once. To date, entities have entered into a CIA with the U.S. Department of Health and Human Services, Office of the Inspector General (OIG). CIAs are case-specific. Their terms are tailored to address deficiencies that have been identified by the OIG with respect to providing and billing for health care services.

If a provider within your jurisdiction is on the list of 27 entities to be reviewed, the regional office (RO) will ask that you identify a contact person at your site to coordinate any activities required by the PSC-CIA relating to the CIA compliance and billing reviews. Provide the name of the contact person to your RO benefit integrity representative. Depending upon the nature of the CIA, the PSC may need documents or other information on the following issues: reimbursement, medical review, benefit integrity, educational correspondence, coverage guidelines, provider files, and local medical

review policies. No systems changes or special reports are required, only information fiscal intermediaries and carriers would have in the normal course of business. It is important for you to coordinate contacts with appropriate program integrity and program management staff.

You are responsible for coordinating appropriate follow-up actions that result from the compliance and billing reviews, such as provider overpayment or underpayment assessment and adjustment.

The Government Task Leader (GTL) or the Co-GTL will initially contact the appropriate RO to discuss the CIA workflow requirements. This will permit the RO to be aware of the coordination that will take place. The GTL or Co-GTL will then make the initial contact with your contact person regarding the PSC-CIA workflow process, necessary time lines and inform you when the PSC will contact you. The PSC will contact you and inform you of exactly what information it needs. You are to provide information within fifteen (15) working days. If there is a problem supplying the information or a delay in giving the information, immediately contact the GTL or Co-GTL. Due to the confidential nature of the CIA, do not disclose any information about the CIA or your communication with the PSC-CIA at any time.

We do not anticipate this program memorandum will require any standard system changes. If there are any question or concerns, contact the GTL, John Martino at (215) 861-4177, E-mail jmartino@hcfa.gov or the Co-GTL, Maureen Savory at (410) 786-3077, E-mail msavory@hcfa.gov.

The *effective date* for this PM is February 1, 2000.

The *implementation date* for this PM is September 5, 2000.

These instructions should be implemented within your current operating budget.

This PM may be discarded after August 1, 2001.

If you have any questions, contact Maureen Savory at (410) 786-3077 or John Martino at (215)-861-4177.