Centers for Medicare & Medicaid Services

Center for Program Integrity

Medicaid Integrity Program

Annual Summary Report

of the

Medicaid Integrity Institute

and

Related Educational Activities

July 2014

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Executive Summary

Since 2007, the Medicaid Integrity Institute (MII) has provided professional education to more than 4,200 Medicaid employees from every state, the District of Columbia, and Puerto Rico. To accomplish that, the

> **MII Mission** – To provide effective training tailored to meet ongoing needs of State Medicaid program integrity employees.

Centers for Medicare & Medicaid Services (CMS) executed an interagency agreement with the Executive Office for the United States Attorneys, Department of Justice (DOJ) to house the MII at the National Advocacy Center (NAC), located in Columbia, South Carolina. The first national Medicaid integrity training program, the MII provides a unique opportunity for CMS to offer substantive training, technical assistance, and support to the states in a structured learning environment.

> **FFY2008-FFY2013**
> -Trained state employees from all 50 States, D.C., and Puerto Rico
> -Offered 101 courses/workgroup meetings with 4,278 enrollments
> -Issued 59 program integrity professional certifications

The MII's mission is to provide effective training tailored to meet the ongoing needs of state Medicaid program integrity employees, with the goal of raising national program integrity performance standards and professionalism. This meets, in part, CMS' statutory obligation to provide support and assistance to help states combat provider fraud and abuse. By embracing and utilizing sound learning methodology and instructional design, coupled with progressive technology, the MII training staff endeavors to provide outstanding professional education and training. The most significant unanticipated benefit of the MII has been the value states have recognized from sharing information and comparing best practices with colleagues from other states.

The MII focuses on developing a comprehensive program of study addressing aspects of Medicaid program integrity to include: fraud investigation, data mining and analysis, and case development. The MII has established the designation of Certified Program Integrity Professional for state employees who complete a rigorous curriculum of fundamental courses and examinations. In addition, the National Health Care Anti-Fraud Association, the Association of Certified Fraud Examiners, and the American Academy of Professional Coders recognize MII courses and award continuing education credits for applicable training segments that meet the criteria of each organization. Instructors at the MII include state Medicaid program administrators and subject matter experts, federal and state law enforcement officers, private consultants, and members of academia. Training at the MII is offered at no cost to the states. The first objective of the MII is to offer training that addresses current issues and challenges faced by state Medicaid program integrity employees. Employees from other federal and state Medicaid components may also participate, depending on the course objectives.

Since its inception, the MII has repeatedly been praised by states, Congress, the Government Accountability Office, and other entities for providing significant value to states in their efforts to more effectively combat Medicaid fraud, waste, and abuse.

Educational Curriculum

The MII provides training and networking opportunities to the states to improve overall Medicaid program integrity activities in combating fraud, waste, and abuse. The success of MII lies largely with the commitment of our state partners in participating in workgroups and as faculty for our various courses. The subject matter experts (SMEs) within the state agencies are valued faculty and provide the training materials used for the tailored courses. The state SME faculty and students become an added resource for the participants when they return to their agencies. The variety of programs offered is tailored to meet the needs of state Medicaid program integrity units. The tailored courses include:

- ➢ Basic Skills and Techniques in Medicaid Fraud Detection
- ➢ Specialized Skills and Techniques in Medicaid Fraud Detection
- ➢ Program Integrity Fundamentals
- ➢ CMS-64 and Program Integrity Accounting Seminar
- ➢ Coding for Non-Coders
- ➢ Data Experts Symposium
- ➢ Electronic Health Records Symposium
- ➢ Emerging Trends in Behavioral Health Symposium
- ➢ Emerging Trends in Home Health, Durable Medical Equipment (DME), and Personal Care Services
- ➢ Emerging Trends in Managed Care Seminar
- ➢ Emerging Trends in Medicaid Benefit Integrity Symposium
- ➢ Emerging Trends in Medicaid Program Integrity Symposium
- ➢ Emerging Trends in Pharmacy Symposium
- ➢ Faculty Development Seminar
- ➢ Interactions Between Medicaid Fraud Control Units and Program Integrity Units
- ➢ Investigation Data Collaboration: Acquisition, Analysis, and Use
- ➢ Program Integrity Directors' Symposium
- ➢ Program Integrity Enhancements from the Affordable Care Act Symposium
- ➢ Program Integrity Leadership Forum
- ➢ Program Integrity Partnership in Managed Care Symposium
- ➢ Provider Auditing Fundamentals
- ➢ Testifying & Report Writing Skills

In addition to tailored courses, the MII offers several off-the-shelf (vendor) courses throughout the FFY. The vendor courses include:
- ➢ CPT Outpatient Coding Boot Camp
- ➢ CPT Inpatient/DRG Coding Boot Camp

> ➢ Evaluation and Management Boot Camp
> ➢ Medical Record Auditing Program
> ➢ Interviewing and Interrogation Program
> ➢ ICD-10 Basics Boot Camp

MII Advisory Group

An annual advisory group meeting is held among staff members from CMS, MII, and senior state program integrity officials comprising the Medicaid Fraud and Abuse Technical Advisory Group (TAG). The TAG provides CMS and the MII with critical input and recommendations for training topics and courses for the following year. The TAG provides state agency updates and guidance on what issues the states are facing in order to provide SMEs for each course. The TAG is divided into workgroups that are charged with identifying and developing suggestions that can be shared during the monthly TAG call with states, CMS, and the MII. The success of MII lies largely with the commitment of our state partners. The tailored courses are identified in the yearly meeting with the MII advisory group and developed by working group experts from states, CMS, and MII staff.

State Participation Results

The first MII course was held in February 2008. Between then and the end of FFY 2013, the MII trained state employees from all 50 states, the District of Columbia, and Puerto Rico through 4,278 enrollments in 95 courses and 6 workgroups. In FFY 2013 the MII conducted 18 courses and 1 workgroup with 895 enrollments. Many states have also provided SMEs to serve as faculty members as well. A portion of the enrollments include state employees who have attended more than one MII course since inception. The unduplicated count of state employees who have participated in MII courses since inception through the end of FFY 2013 is 1,969. The annual breakdown students and faculty is as follows:

Table 1

FFY	Participants	Courses/Workgroups	Participating States
08	270 Students: 261 Faculty: 9	7 courses	49 states, D.C. and Puerto Rico
09	744 Students: 619 Faculty: 125	18 courses	49 states, D.C. and Puerto Rico
10	590 Students: 519 Faculty: 71	13 courses 1 workgroup = 14	49 states and D.C.
11	860 Students: 735 Faculty: 125	18 courses 1 workgroup = 19	50 states, D.C. and Puerto Rico
12	919 Students: 811 Faculty: 108	21 courses 3 workgroups = 24	50 states, D.C. and Puerto Rico
13	895 Students: 762 Faculty: 133	18 courses 1 workgroup = 19	50 states, D.C. and Puerto Rico

Value Proposition to States (Participant Feedback)

The MII asks the states to complete a post course survey approximately 60 days after course completion. The purpose of the survey is to help MII determine the value and effectiveness of the training received, and to help improve future courses. The information reported is self-identified by the states and not verified by MII or CMS.

Emerging Trends in Home Health and Personal Care Services – January 2013 (Oregon attendee)
"Our hospice unit has opened two audits so far on hospice providers since my training. We are looking at the eligibility and length of services. At least one provider had a client on hospice for approximately three years."

Emerging Trends in Managed Care – February 2013
"The training improved my understanding of managed care and made it possible for me to recommend additional RAC (Recovery Audit Contractor) activities directed at providers in our managed care networks. Previously, the RAC had focused only on fee for service providers. Further, since this course, our agency has begun to review the third party liability activity of our managed care contractors to seek more efficient and effective efforts.

Management Feedback (Alaska)
"The State of Alaska was able to charge 29 individuals with Medicaid Fraud in the personal care assistant program. This was a product of a 'sweep' technique picked up at the MII at the PI/MFCU (Program Integrity/Medicaid Fraud Control Unit) directors' conference in January. In talking with the PI director from Texas we learned about the 'sweeps' being conducted. We suggested the Alaska MFCU and PI conduct a joint sweep. The investigation is not over and more charges will be coming."

Management Feedback (Connecticut)
"The payment suspension requirements of the Affordable Care Act were thoroughly discussed at more than one training session. The information obtained was invaluable. Connecticut has recognized millions in cost avoidance and recoupment from a dental provider due to the information obtained at the MII."

Certification Program Feedback (Illinois)
"I would like to congratulate Cam Jones, the MII staff, and faculty for the success of the first MII certification class. Without question, the addition of the certification program resulted in a substantial and measurable difference in the focus, effort, and mastery of skill achieved by this year's program participants. The participants' dedication to learning was evident by their class participation, their questions, and by the many 'group study sessions' that went on well beyond the classroom lecture periods. In addition to the group's test scores, the group's participation in the final workshops demonstrated a much higher level of understanding and mastery of the content taught in the class lectures.

There is no question that the work done by the certification working group resulted in an outstanding training program and educational opportunity for state Medicaid staff. The participants consistently commented to me that the program was the best training they had ever received. I too was very impressed by the quality of the presentations. I expect a far greater impact for the state Medicaid programs."

Secure Information Sharing

The MII supports a Medicaid program integrity workspace on the Regional Information Sharing System (RISS) a secure, web-based system for collaboration and dissemination where all states can exchange documents, tips, and best practices about Medicaid program integrity under the auspices of the DOJ Office of Legal Education. RISS is available to state Medicaid program integrity agency representatives across the country and continues to provide an effective platform for sharing and collaboration. One of the MII's dedicated RISS users creates a bi-weekly newsletter, the *MII Messenger,* which is generated using information shared by states on RISS and distributed to all state MII workspace participants. In addition, state users have the ability to post questions and communicate with counterparts in the program integrity community across the country.

As of December 11, 2013, there are 291 RISS users of the MII workspace from all 50 states and the District of Columbia. Folders that can be found on RISS include:
  ➢ Announcements – important messages and updates of general interest
  ➢ Discussion Board – question and answer folder
  ➢ MII Resource Library – MII course materials and discussions
  ➢ In The News – program integrity related news releases
  ➢ States' Best Practices – sharing techniques and practices that have led to successful state recoupments, program enhancements, or innovative solutions.
  ➢ Policies and Statutes – state policies, program policies and MIG information
  ➢ Audit/Review, Enrollment, and Exclusion – state resources, templates, tips
  ➢ State Fraud Alerts – common fraud schemes
  ➢ CMS Resources – CMS fraud alerts, Medicare terminations, Medicaid TAG minutes, MIG program integrity review guide modules, etc.
  ➢ Medicaid National Correct Coding Initiative (NCCI) Methodologies – maintained by CMS
  ➢ Return on Investment – sharing MII training benefits

Distance Learning

The MII began hosting distance learning webinars in FFY 2011. The addition of distance learning allows the MII to provide access to training on additional topic areas outside of those offered at the National Advocacy Center. In addition, distance learning extends the MII's reach. It allows participants to receive training that they would otherwise not have the opportunity to receive, either from non-selection or state travel restrictions. The FFY 2013 distance learning sessions provided include:

  ➢ Alabama Medicaid Hemophilia Standards of Care
  ➢ An Overview of Effective Presentation and Facilitation Techniques
  ➢ Basic Data Integrity, Data Mining, and Analysis
  ➢ Certified Program Integrity Professional Program Overview

- ➢ Data Extrapolation
- ➢ Emerging Trends in Pharmacy – Data Issues and Algorithms
- ➢ Emerging Trends in Pharmacy – Desk Audits
- ➢ Health Care Fraud and Personal Care Assistant Best Practices
- ➢ Pharmacy and the Affordable Care Act – Drug Rebates and Disputes
- ➢ Specialty Drugs
- ➢ Standards for the Practice of Sampling

In FFY 2014, the MII distance learning opportunities and/or webinars will be provided monthly. Projected sessions include:

- ➢ Basic Fraud Awareness Education (Behavioral Health)
- ➢ Beneficiary Application and Enrollment – Background and Overview
- ➢ Beneficiary Application Process – Verification Requirements
- ➢ Beneficiary - Implications of the Affordable Care Act for Program Integrity
- ➢ Beneficiary – Identifying Outliers: Testing for Accuracy
- ➢ Coding for Non-Coders
- ➢ Introduction to RISS
- ➢ Pediatric Dental Schemes
- ➢ Program Integrity Data Analysis, Sampling, and Extrapolation
- ➢ Sampling for Compliance and Control
- ➢ Sampling for Recoupment and Prevention

Certification Program

In FFY 2012, the MII Certification and Credentialing Working Group developed a plan for credentialing MII courses for professional certification for state program integrity employees. As a result of this work, the working group in agreement with CMS defined a program of courses and examinations for the first Certified Program Integrity Professional (CPIP) designation. The National Health Care Anti-Fraud Association, the Association of Certified Fraud Examiners, and the American Academy of Professional Coders recognize MII courses and award continuing education credits for applicable training segments that meet the criteria of each organization. To earn the CPIP credential, MII students are required to complete three core concept courses – Basic Skills and Techniques in Medicaid Fraud Detection, Program Integrity Fundamentals Seminar, and Specialized Skills and Techniques in Medicaid Fraud Detection – and demonstrate content mastery on corresponding examinations.

The first Certified Program Integrity Professional designations were issued in FFY 2013 to state program integrity employees who completed the requirements. By the end of FFY 2013, 59 state employees from 28 states have earned the CPIP credential.

Related Educational Activities

In addition to the training provided at the MII, CMS has sponsored 15 training courses for 405 students at state locations from FFY 2008-FFY 2013.

Table 2

FFY	Course Name	Students	Location
2008	CPT Coding Outpatient Boot Camp	101	1-Illinois, 1-California, and 2-Maryland (open to all states)
2010	CPT Coding Outpatient Boot Camp	102	1-California, 1-Florida, 1-New York, and 1-Texas
2011	CPT Coding Outpatient Boot Camp	77	1-California, 1-Florida, and 1-Illinois
2011	Medical Record Auditing	76	1-Georgia, and 1-Texas
2013	Interviewing & Interrogation Techniques	49	California – joint training for PI and MFCU
	Training Total:	**405**	

Conclusion

The CMS and DOJ share a strong commitment to ensure state Medicaid programs more effectively combat fraud, waste, and abuse. The MII has been instrumental in achieving that goal. The qualitative and quantitative results reported by states, oversight agencies and Medicaid partners confirms that the professional development offered by the MII represents an unparalleled opportunity for states and CMS to more effectively stem provider fraud and abuse in the Medicaid program. For more information on the MII, please visit the website at: http://www.justice.gov/usao/training/mii/.