

Centers for Medicare & Medicaid Services

Medicaid Integrity Group

Annual Summary Report

Of

Medicaid Integrity Institute

And

Related Educational Activities

February 2013



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Executive Summary

Since 2007, the Medicaid Integrity Institute (MII) has provided professional education to more than 3,300 Medicaid employees from every State, the District of Columbia, and Puerto Rico. To accomplish that, the 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 on the campus of the University of South Carolina 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.

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

FFY2008-FFY2012

- Trained 3,383 State students
- 82 courses
- 50 States, D.C., and Puerto Rico
- States self-reported ROI \$31 million
- CPIP Certification designation

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. States have reported more than \$31 million in overpayments, cost avoidance and budget reductions resulting from the training provided by the MII. The MII's return on investment has been recognized by States, Congress, the Government Accountability Office, and other entities.

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 obtained certification from the National Health Care Anti-Fraud Association. The first Certified Program Integrity Professional (CPIP) courses began in 2012. Instructors at the MII include State Medicaid program administrators and subject matter experts, Federal and State law enforcement officers, private consultants and 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 been recognized for providing significant value to States in their efforts to more effectively combat Medicaid fraud, waste, and abuse.

Value Proposition to States (Financial Return on Investment)

The MII represents a very real value proposition to CMS and the States. As depicted in the chart below, States have self-reported identified overpayments, recovered overpayments, disallowances, avoided costs, and budget reductions totaling more than \$31 million. As of FFY 2012, States have reported approximately:

Table 1

FFY	MII Expenditures	Estimated Value	Categories
2008	\$884,463.50	Not Tracked	Not Tracked
2009	\$1,427,334.86	Not Tracked	Not Tracked
2010	\$1,289,493.01	\$18,604,083	Overpayment, Cost Avoidance, Budget Reduction
2011	\$1,715,138.35	\$3,164,706	Recovery
2012	\$1,843,409.22	\$9,284,370	Overpayment, Cost Avoidance, Disallowance
Total	\$7,159,838.94	\$31,053,159	ROI - \$4.33 to \$1.00

Student feedback reported by States

Medicaid Issues Symposium – October 2011 (Iowa attendee)

“The suspension of payments due to a credible allegation of fraud has resulted in at least two providers going out of business.”

Specialized Skills In Medicaid Fraud Detection Program – November 2011 (Pennsylvania attendee)

“In the area of Home & Community Habilitation, audit disallowances have exceeded \$1 million. The application of techniques presented in preparing for appeals and litigation were beneficial.”

RISS Website – February 2012 (Arkansas attendee)

“As a user of the RISS network, I can tell you first-hand how beneficial this site has been for our State. I found information related to a current case my State was working on in a weekly edition of the MII Messenger.”

Management Feedback (Texas)

“The coursework MII offers affords practical advice and techniques at every level of experience. We require investigators and auditors who attend MII courses to share in a formal manner with our other employees the lessons they learn. We have found that OIG employees who attend MII courses return excited and invigorated, with new ideas and enhanced productivity.

The exchange of information and the personal relationships we have developed from our MII experiences are one of two primary drivers behind the productivity increases we have experienced. Without the MII, we would not have seen an increase of well over 1000% in potential overpayments in a single year and would not have been able to draw

upon the experiences of other states to formulate a comprehensive approach that appears to have worked well.”

Feedback from the National Association of Medicaid Directors (NAMD)

On December 19, 2011, NAMD issued a statement following the Medicaid Fraud and Program Integrity Congressional Hearing held December 7, 2011.

“In addition, one constructive initiative underway is the Medicaid Integrity Institute (MII). The MII provides substantive training, technical assistance and support to state Medicaid program integrity staff. Many of our members report that the MII is an invaluable resource to their state because it provides an opportunity for staff to engage each other on challenges and best practices for Medicaid programs.”

Feedback from the Medicaid and CHIP Payment and Access Commission (MACPAC)

In March 2012, the MACPAC issued their Report to Congress on Medicaid and Children’s Health Insurance Program (CHIP). The MACPAC recommended rationale to enhance program integrity training.

“Feedback from states has indicated that training received at the MII has helped them better address program integrity issues.”

Feedback from Government Accountability Office (GAO)

On April 25, 2012, the GAO released Testimony provided regarding Federal Oversight of Payments and Program Integrity Improvements.

“Finally, we found that the Medicaid Integrity Institute appears to promote effective state coordination and collaboration. We reported that states have uniformly praised the institute and a special June 2011 session brought together Medicaid program integrity officials and representatives of Medicaid Fraud Control Units—independent state units responsible for investigating and prosecuting Medicaid fraud—in 39 states to improve working relations between these important partners.”

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 (SME) within the State agencies are valued faculty and provide the training materials used for the tailored courses. The State SME faculty becomes 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:

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

MIl Advisory Group

An annual advisory group meeting is held among CMS, MII and 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 SME's 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 built out of the yearly meeting with the MII advisory group.

State Participation Results

The first MII course was held in February 2008. Between then and the end of FFY 2012, the MII trained 3,383 State students in 82 courses. All 50 States, the District of Columbia (D.C.), and Puerto Rico have enrolled students to participate in courses at the MII. Many States have also provided SMEs to serve as faculty members as well. There have been 1,685 unduplicated State students/faculty participated in courses at the MII. The annual breakdown students and faculty is as follows:

Table 2

FFY	Participants	Courses	Participating States
08	270 Students: 261 Faculty: 9	7	49 States, D.C. and Puerto Rico
09	744 Students: 619 Faculty: 125	18	49 States, D.C. and Puerto Rico
10	590 Students: 519 Faculty: 71	14	49 States and D.C.
11	860 Students: 735 Faculty: 125	19	50 States, D.C. and Puerto Rico
12	919 Students: 811 Faculty: 108	24	50 States, D.C. and Puerto Rico

Secure Information Sharing

In November 2009, the MII created information sharing internet website named Workspace. Workspace was the first of its kind shared site for State program integrity directors and their staff. Workspace provided a platform for States to share information and collaborate effectively with each other and CMS in combating fraud, waste, and abuse. In November 2011, the MII transitioned to the Regional Information Sharing System (RISS) a DOJ secure website. The website is available to State Medicaid agency staff across the country and continues to provide a platform of sharing and collaboration. One of the MII's dedicated users creates a bi-weekly newsletter that is shared with all State RISS participants. The *MII Messenger* is generated using information shared by States in RISS. In addition, States have the ability to post questions and communicate with counterparts in the program integrity community across the country.

As of January 22, 2013, there are 188 RISS users with 27 applications pending approval. 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 FFY2011. The addition of distance learning allows the MII to provide access to training on additional topic areas outside of the FFY schedule. 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 distance learning sessions provided include:

- Auditing for the Medicaid EHR Incentive Program
- Improving Collaboration between Program Integrity and Medicaid Fraud Controls Units
- Emerging Trends in Pharmacy Hot Topics – Specialty Drugs

➤ Data Experts Working Group

Beginning in FFY2013, the MII distance learning opportunities and/or webinars will be provided monthly. Projected sessions include:

- Data Algorithms
- Managed Care
- Predictive Analytics
- Home Health
- Home and Community-Based Services
- Behavioral Health
- Primer on Qualifying for the Certified Program Integrity Professional
- Emerging Trends in Pharmacy – Hot Topics, Hemophilia
- Emerging Trends in Pharmacy – Hot Topics, Desk and Field Audits

Certification Program

In May 2012, the Certification and Credentialing Working Group convened at the MII to continue its work on one of the MIG's top priorities, defining and developing a plan for credentialing and certifying MII courses. This group identified three phases of implementation, including a basic phase to analyze the core concepts for three MII courses, Basic Skills and Techniques in Medicaid Fraud Detection, Program Integrity Fundamentals, and Specialized Skills in Medicaid Fraud Detection. Mastery of these courses will require passing an exam for each course. The tests were developed by an instructional design expert along with members of the working group.

Prior to the FFY2012 onsite meeting at the MII, the working group obtained certification from the American Association of Professional Coders and the National Health Care Anti-Fraud Association. The working group will continue to seek recognition of its training from other national organizations.

The first Certified Program Integrity Professional (CPIP) designation is scheduled to be issued in FFY2013, depending on State employee participation in the certification training.

MII Expansion

In September 2011, CMS and DOJ agreed to the expansion of the MII. The Center for Program Integrity is committed to support the expansion of focus to include Medicare program integrity education needs, while continuing to meet Medicaid program integrity needs.

On July 9, 2009, Deputy Attorney General David W. Ogden announced plans by DOJ to significantly expand its training and education operations at the NAC, the core training facility for local, State and Federal attorneys, law enforcement agents, and support

personnel, and the MII. As part of the Palmetto Project – as it is known – DOJ will lease approximately 326,000 square feet of space at the Close-Hipp Building adjacent to the NAC to enhance the training capabilities. Some of the new details include:

- Additional 20,000 square feet in training space dedicated solely to the MII. The dedicated space will ensure the MII will not have to compete for space on the DOJ training calendar.
- Multiple classrooms, breakout areas, offices, and support spaces (e.g. business center, swing office space for visitors, refreshment center, reception area, and discussion spaces).
- Updated acoustics with state-of-the-art sound system.
- Access to a 250-seat, theatre-style auditorium for larger meetings and training.
- New and modern dining facility.
- Medical/nurses' station.
- Green space on the roof for students/staff to sit outside, weather permitting.
- Glass windows and doors throughout to maximize natural light.

Related Educational Activities

In addition to the training provided at the MII, CMS has sponsored 14 training courses for States. In FFY2008, CMS sponsored the first non-MII training for State employees.

Table 3

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
	Training Total:	356	

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/eousa/ole/mii/>.