

<b>CMS Manual System</b>	<b>Department of Health &amp; Human Services (DHHS)</b>
<b>Pub 100-08 Medicare Program Integrity</b>	<b>Centers for Medicare &amp; Medicaid Services (CMS)</b>
<b>Transmittal 871</b>	<b>Date: March 29, 2019</b>
	<b>Change Request 11159</b>

**SUBJECT: Update to Section 4.12 in Chapter 4 of Publication (Pub.) 100-08**

**I. SUMMARY OF CHANGES:** The purpose of this Change Request (CR) is to update Section 4.12 in Chapter 4 of Pub. 100-08 to provide instructions related to Unified Program Integrity Contractor (UPIC) workload entry and update requirements in the Unified Case Management System (UCM).

**EFFECTIVE DATE: April 29, 2019**

*\*Unless otherwise specified, the effective date is the date of service.*

**IMPLEMENTATION DATE: April 29, 2019**

*Disclaimer for manual changes only: The revision date and transmittal number apply only to red italicized material. Any other material was previously published and remains unchanged. However, if this revision contains a table of contents, you will receive the new/revised information only, and not the entire table of contents.*

**II. CHANGES IN MANUAL INSTRUCTIONS:** (N/A if manual is not updated)

R=REVISED, N=NEW, D=DELETED-Only One Per Row.

<b>R/N/D</b>	<b>CHAPTER / SECTION / SUBSECTION / TITLE</b>
R	4/Table of Contents
R	4/4.12/Unified Case Management System
R	4/4.12/4.12.1/Initial Entry and Update Requirements for UPIC Initiated Projects
R	4/4.12/4.12.2/Initial Entry and Update Requirements for UPIC Leads and Investigations
R	4/4.12/4.12.3/Initial Entry and Update Requirements for RFIs/RFAs
R	4/4.12/4.12.4/Initial Entry and Update Requirements for LE Payment Suspension Requests
N	4/4.12/4.12.5/Update Requirements for Immediate Advisements
N	4/4.12/4.12.6/Attaching Documents and Files in the UCM
N	4/4.12/4.12.7/Duplicate Entries
N	4/4.12/4.12.8/Deleting Entries in the UCM
N	4/4.12/4.12.9/UCM Helpdesk

**III. FUNDING:**

**For Medicare Administrative Contractors (MACs):**

The Medicare Administrative Contractor is hereby advised that this constitutes technical direction as defined

in your contract. CMS does not construe this as a change to the MAC Statement of Work. The contractor is not obligated to incur costs in excess of the amounts allotted in your contract unless and until specifically authorized by the Contracting Officer. If the contractor considers anything provided, as described above, to be outside the current scope of work, the contractor shall withhold performance on the part(s) in question and immediately notify the Contracting Officer, in writing or by e-mail, and request formal directions regarding continued performance requirements.

#### **IV. ATTACHMENTS:**

**Business Requirements  
Manual Instruction**





### III. PROVIDER EDUCATION TABLE

Number	Requirement	Responsibility				
		A/B MAC			DME MAC	CEDI
		A	B	HHH		
	None					

### IV. SUPPORTING INFORMATION

**Section A: Recommendations and supporting information associated with listed requirements: N/A**

*"Should" denotes a recommendation.*

X-Ref Requirement Number	Recommendations or other supporting information:

**Section B: All other recommendations and supporting information: N/A**

### V. CONTACTS

**Pre-Implementation Contact(s):** Jesse Havens, 410-786-6566 or jesse.havens@cms.hhs.gov

**Post-Implementation Contact(s):** Contact your Contracting Officer's Representative (COR).

### VI. FUNDING

**Section A: For Medicare Administrative Contractors (MACs):**

The Medicare Administrative Contractor is hereby advised that this constitutes technical direction as defined in your contract. CMS does not construe this as a change to the MAC Statement of Work. The contractor is not obligated to incur costs in excess of the amounts allotted in your contract unless and until specifically authorized by the Contracting Officer. If the contractor considers anything provided, as described above, to be outside the current scope of work, the contractor shall withhold performance on the part(s) in question and immediately notify the Contracting Officer, in writing or by e-mail, and request formal directions regarding continued performance requirements.

**ATTACHMENTS: 0**

# Medicare Program Integrity Manual

## Chapter 4 - Program Integrity

### Table of Contents *(Rev. 871, Issued: 03-29-19)*

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## **4.12 - Unified Case Management System**

**(Rev. 871; Issued: 03-29-19; Effective: 04-29-19; Implementation: 04-29-19)**

*The Unified Case Management (UCM) System is a national database that the UPICs use to enter and update Medicare and Medicaid fraud, waste, and abuse data analysis projects, leads, and investigations initiated by the UPIC. Additionally, the UCM allows the UPICs to enter and track various administrative actions (i.e., pre or post-payment reviews, payment suspensions, revocations, etc.), requests for assistance (RFAs), and requests for information (RFIs) that are fulfilled by UPICs at the request of law enforcement, CMS, or other stakeholders.*

*Additional details related to each field in the UCM can be referenced in the UCM user manual. The UPIC shall complete all appropriate UCM training and reference the UCM user guide for specific instructions on how to utilize the UCM. The UPIC users shall become proficient and knowledgeable users of the UCM. The UPIC shall be responsible for ensuring they are using the UCM as the system of record and that all data entered into the UCM is entered correctly. This requirement includes, but is not limited to, the spelling of names and accuracy of addresses and identifiers that are entered, etc.*

*The following agencies/organizations currently have access to the UCM:*

- *UPICs*
- *National Benefit Integrity Medicare Drug Integrity Contractor (NBI MEDIC)*
- *Railroad Retirement Board (RRB)*
- *CMS contractors (FPS, PIMAS, Acumen, IBM)*
- *MAC Medical Review Units associated with MPIP*
- *CMS*
- *FBI*
- *DOJ*
- *HHS/OIG*
- *Other federal and state partners seeking to address program integrity concerns in judicial or state health care programs*

*All workload received and/or initiated by the UPIC shall be saved in the UCM and shall contain identifying information on the potential subject(s) of a project, lead, investigation, etc., as well as general information on activities performed by the UPIC to substantiate the allegation of potential fraud, waste, or abuse. Investigative workload initiated by the UPIC shall contain a summary of the pertinent information related to any activities and/or resolution, and all fields in the UCM shall be updated with the applicable information as it is received by the UPIC.*

*The following are the general guidelines associated with project, investigation, RFI/RFA, and administrative action requirements in the UCM:*

### **4.12.1 - Initial Entry and Update Requirements for UPIC Initiated Projects**

**(Rev. 871; Issued: 03-29-19; Effective: 04-29-19; Implementation: 04-29-19)**

*UPICs shall log a proactive data project into the UCM as a “PDP” record type within seven (7) calendar days of initiating the study/project. As new information is identified, the UPIC shall make updates to the PDP as needed, but no less than every thirty (30) calendar days. The PDP should include reference to all subjects as they are identified, in addition to plan of action, projected next steps related to the study/project analysis, etc.*

*Each study/project will vary in terms of age. There are instances when a PDP may stay open and continue to generate leads, or the PDP may be closed after the identification of a specific number of leads. However, if a PDP has not generated a lead within ninety (90) calendar days, the UPIC shall close the PDP within seven (7) calendar days, unless otherwise directed by CMS.*

#### **4.12.2 - Initial Entry and Update Requirements for UPIC Leads and Investigations** (Rev. 871; Issued: 03-29-19; Effective: 04-29-19; Implementation: 04-29-19)

*Leads and Investigations are logged into the UCM as a case record type (CSE). CSEs are generated based on PDP outcomes, or through a reactive measure (i.e., complaint, FPS lead, etc.). When a PDP identifies a lead that justifies the opening of a CSE, the UPIC shall initiate the CSE from the PDP record within seven (7) calendar days, unless otherwise directed by CMS. When a reactive lead is identified, the UPIC shall initiate a CSE within seven (7) calendar days of receipt of the lead. All leads are required to be screened in accordance with the Medicare PIM guidelines at Chapter 4, Section 4.6.3 – Screening Leads, unless otherwise directed by CMS.*

*CMS expects the UPICs to make timely updates, generally within two (2) business days of the action, to the UCM throughout the course of a lead and/or investigation. The UPIC shall document all activities it has performed in order to substantiate any allegations of potential fraud, waste, or abuse. For example, on-site visits, medical reviews, audits, data analysis, etc., shall be documented, along with the applicable dates for each action. Investigative notes should be documented in the Record Summary, rather than added as a separate document, attachment, etc.*

*The UPIC shall take all appropriate administrative actions, as defined in PIM Chapters 3, 8, and/or 15. Each action shall be noted in the UCM under the appropriate administrative action record type (i.e., PSP, OPT, REV, PPE, etc.) and linked to the primary investigation CSE record, when applicable. Of note, when pursuing an administrative action based on an existing CSE, the UPIC shall generate the appropriate administrative action record from the originating CSE record. The primary investigation record (CSE) should include a high level summary of the action(s) taken within the administrative action record. In addition, all applicable documents linked to these activities shall be uploaded to the corresponding UCM record.*

*In instances where the UPIC is referring the subject of an investigation to law enforcement, the UPIC shall generate a referral record (REF) per the primary NPI from the case record (CSE) within seven (7) calendar days of each referral, unless otherwise directed by CMS. The primary investigation record (CSE) should include a high level summary of the action(s) taken within the referral record. In addition, all applicable documents linked to the referral shall be uploaded to the UCM referral record.*

*For investigations referred to law enforcement (i.e., OIG, DOJ, FBI, etc.), updates to the UCM shall be made within the following parameters:*

- Upon notice from law enforcement on the status of the referral, UCM updates shall be made within seven (7) calendar days;*
- If the investigation is accepted and the contractor has no pending administrative actions, the UPIC shall close the case in the UCM within seven (7) calendar days;*
- If the case is accepted and the UPIC has pending administrative actions, the UPIC shall keep the case open in the UCM and pursue the outstanding administrative actions as directed by CMS. Once law enforcement closes its case and all administrative actions have been finalized, the UPIC shall close the case in the UCM within seven (7) calendar days.*
- Information regarding law enforcement activities that are, or could be considered to be, of a sensitive nature shall not be entered into the UCM. These activities include, but are not limited to, planned search warrants, undercover operations and activities, and executed search warrants, where only some of the search warrants have been executed.*

*After all actions are taken and all subsequent administrative activities are complete, the UPIC shall close the investigation in the UCM within seven (7) calendar days.*

#### **4.12.3 - Initial Entry and Update Requirements for RFIs/RFAs** (Rev. 871; Issued: 03-29-19; Effective: 04-29-19; Implementation: 04-29-19)



*RFIs/RFAs and all applicable documentation shall be entered into the UCM within seven (7) calendar days of receipt of the RFI/RFA. The UPIC shall update the Hours to Complete data field with the estimated time it will take the UPIC to fulfill the RFI/RFA. If it is estimated that the RFI/RFA will take 40 or more hours to fulfill, the UPIC shall select the Submit to COR workflow button, which will send a notification to the COR requesting approval to proceed.*

*CMS expects the UPICs to make regular updates to the UCM throughout the course of fulfilling the RFI/RFA. This shall include, but is not limited to:*

- A detailed overview of the RFI/RFA;*
- Details related to any communication with LE regarding the RFI/RFA;*
- Any changes to the parameters of the RFI/RFA; and*
- Information pertaining to the completion of the RFI/RFA.*

*Within seven (7) calendar days of completing the RFI/RFA, the UPIC shall update the Fulfillment Date data field with the date the RFI/RFA was submitted to the requestor and close the RFI/RFA UCM record.*

#### ***4.12.4 - Initial Entry and Update Requirements for LE Payment Suspension Requests (Rev. 871; Issued: 03-29-19; Effective: 04-29-19; Implementation: 04-29-19)***

*Law Enforcement Payment Suspension Requests and all applicable documentation shall be entered into the UCM within five (5) calendar days of receipt of the request, unless otherwise directed by the Payment Suspension team manager.*

*CMS expects the UPICs to make timely updates, generally within two (2) business days of the action, to the UCM throughout the course of a LE Payment Suspension, including timely monthly reports of any escrow dollars. If the Payment Suspension is a National Payment Suspension, the UPIC shall follow the process outlined in 4.11.2.6 – Update Requirements for National DMEPOS Payment Suspensions. The lead UPIC is responsible for entering all documentation into the UCM within five (5) calendar days as well as communicating/coordinating with the non-lead UPICs to make sure their information also is entered timely.*

*Within seven (7) calendar days of the termination of a LE payment suspension, or if a LE Payment Suspension request is denied or withdrawn, the UPIC shall finalize any remaining actions and close the UCM Payment Suspension (PSP) record.*

#### ***4.12.5 - Update Requirements for Immediate Advisements (Rev. 871; Issued: 03-29-19; Effective: 04-29-19; Implementation: 04-29-19)***

*When criteria for an Immediate Advisement to the OIG/OI is met based on the criteria referenced in Chapter 4, § 4.18.1.2, of the PIM, the UPIC shall notify the OIG/OI by phone or email to determine if a formal Immediate Advisement should be sent to the OIG/OI. The UPIC shall document this communication in the UCM Record Summary field immediately. Should the OIG/OI confirm that an Immediate Advisement should be sent, the UPIC shall provide all available documentation to the OIG/OI within four (4) business days. Upon submission of an Immediate Advisement to the OIG/OI, the UPIC shall update the applicable UCM fields, as referenced in the UCM User Manual, within two (2) calendar days of submission. Once notification is received by the OIG/OI regarding its acceptance or declination of the Immediate Advisement, the UPIC shall update the applicable UCM fields within two (2) calendar days of the notice. All further correspondence and details associated with the Immediate Advisement shall be documented in the UCM Record Summary field as it is received.*

#### ***4.12.6 - Attaching Documents and Files in the UCM (Rev. 871; Issued: 03-29-19; Effective: 04-29-19; Implementation: 04-29-19)***

*The UCM has the capability to allow for documents and files to be attached in each record type. Each record type has pre-designated attachment folders, in addition to an option for the UPICs to create their own folders. The UPICs shall ensure that all necessary documents are attached in the appropriate folder,*

*and the most up-to-date version of each document and/or file is attached. Should a document and/or file have multiple versions that need to be attached, the UPIC shall notate the date in the document/file name. Documents and/or files that are replaced by an updated version shall be removed as long as all relevant and necessary information remains in the most up-to-date version.*

*Acceptable UCM attachments may include, but are not limited to:*

- Documents related to the predication of the case (i.e., data analysis reports, complaint information, fraud referral information, etc.)*
- Beneficiary interview reports*
- Onsite reports, including onsite summaries, provider interview reports, staff interview reports, attestation documents*
- Documents related to applicable administrative actions (i.e., AAR forms, statistical sampling reports, etc.)*
- Referrals to law enforcement or other applicable stakeholders (i.e., MAC, QIO, etc.)*

#### ***4.12.7 - Duplicate Entries***

***(Rev. 871; Issued: 03-29-19; Effective: 04-29-19; Implementation: 04-29-19)***

*A duplicate entry exists when a UPIC inadvertently enters a provider, supplier, or beneficiary as the subject of a lead, investigation, etc., absent other differentiating criteria requiring a separate investigation, case, payment suspension, or RFI entry.*

*Entries shall not be considered a duplicate if multiple UPICs enter the same provider/supplier as the subject of the lead, investigation, etc. These entries shall be linked and cross-referenced by the UPIC in the UCM to indicate that more than one UPIC is involved in investigating the provider/supplier.*

*If a new lead or investigation is initiated on a provider/supplier that was already the subject of a closed investigation or case, a new entry shall be opened. The closed entry, however, shall be documented and linked to the new entry in the UCM.*

*The primary subject of the investigation, whether a business or individual, shall be entered as the subject of the UCM entry, when possible. The UPIC shall check for potential duplicate entries of leads, investigations, etc., when making its initial entry into the UCM.*

#### ***4.12.8 - Deleting Entries in the UCM***

***(Rev. 871; Issued: 03-29-19; Effective: 04-29-19; Implementation: 04-29-19)***

*Entries can be deleted from the UCM only by users with the system administrator designation. The UPIC shall contact its COR and BFLs to discuss the need for deleting an entry. If the COR and BFLs agree that the entry should be deleted, the UCM system administrator has the ability to delete any entries. To initiate any deletions, the UPIC shall send an e-mail to its COR and BFL detailing the need for the entry deletion. The COR and BFL will then forward the issue to the UCM SME, who will be responsible for coordinating the deletion of the entry.*

#### ***4.12.9 - UCM Helpdesk***

***(Rev. 871; Issued: 03-29-19; Effective: 04-29-19; Implementation: 04-29-19)***

*For UCM issues, users can contact the UCM helpdesk at [UCMHelpDesk@cms.hhs.gov](mailto:UCMHelpDesk@cms.hhs.gov) or [UCMHHD@us.ibm.com](mailto:UCMHHD@us.ibm.com).*