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Insights

Updates to the Office of Inspector General Work Plan and Compliance Website

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By: Susan E. Ziel and Brandon W. Shirley

The Health and Human Services' Office of Inspector General ("OIG") has published an annual Work Plan for many years, which typically reported on current OIG audits and evaluations, in addition to certain legal and investigative efforts, that concerned compliance issues across the many industry groups participating in Federal Health Care Programs, including the Medicare and Medicaid programs.

Over the years, we have reported on these annual Work Plans, which represent a useful tool for most health care providers in their efforts to identify and address potential risk areas as part of their ongoing compliance audit and monitoring procedures. The OIG made some important changes to its website that adopts a new "real time" web-based reporting format to more closely track the OIG's work planning process. Notably, the "Recently Added" tab provides monthly updates on newly initiated Work Plan items. Additionally, the "What's New" tab offers additional information regarding recent OIG activities, such as proposed regulations, newly published Advisory Opinions and updates to the Corporate Integrity Agreement database. This OIG webpage has many other useful tools for compliance officers or other staff with compliance responsibilities.

As you consider potential risk compliance risk areas for the upcoming year, you should review the OIG's new format for organizing OIG's top initiatives. The OIG previously presented Work Plans around the many different healthcare industry groups participating in Federal Health Care Programs. The new monthly format compiles all topical subject matter into a single listing of potential risks or issues that may involve one or more industry groups and/or a particular Federal Health Care Program.

For example, as part of the January 2019 update, the "Recently Added" webpage reports out current OIG initiatives, including:

1. Medicare Payments for Clinical Diagnostic Laboratory Tests in 2018
2. States' Compliance with New Requirements to Prevent Medicaid Payments to Terminated Providers
3. Follow Up Review on Inpatient Claims Subject to Post-Acute Care Transfer Policy
4. Utilization and Pricing Trends for Naloxone in Medicaid
5. Medicare Outpatient Outlier Payments for Claims with Credits for Replaced Medical Devices
6. Duplicate Payments for Home Health Services Covered Under Medicare and Medicaid

It would be worthwhile to become familiar with this new OIG Work Plan format and continue to use it for purposes of updating your organization's ongoing compliance audit procedures. As always, we are available to assist you with these important steps in maximizing your organization's compliance program effectiveness through the coming year. Contact Susan E. Ziel at Integrity Health Strategies, sziel@ihsconsultinggroup.com,

or Brandon W. Shirley at Krieg DeVault, bshirley@kdlegal.com, if you have any questions or require additional information regarding your organization's compliance programs or other healthcare updates.