



## Surveillance Utilization Review Section (SURS)

## **IHS/Tribal Provider Training**



June 21, 2022

Jennifer Tucker, CPC

SURS Supervisor



## What is SURS?

## Surveillance Utilization Review Section is a federally mandated program [42 CFR, Part 456.3]

The program maintains a strong commitment to assure that the right provider is receiving the right payment for the right services at the right time. We identify potential fraud, waste and abuse to ensure that State and Federal monies are spent appropriately.





## We accomplish this by:

- performing retrospective reviews
- educating providers
- recovering overpayments if indicated





## The Medicaid Processing System

- Claims processing system includes numerous edits
- To identify most billing errors
- It doesn't detect all eman





## The Medicaid Processing System

- Some claims are paid in error
  - due to incorrect billing
  - system complications
- ALL paid claims are subject to retrospective review
  - this includes prior authorized claims



## **Overpayment Recovery**



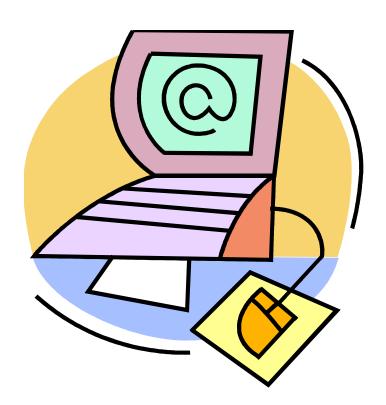
SURS can recover if it discovers that the provider was not entitled to payment for any reason.

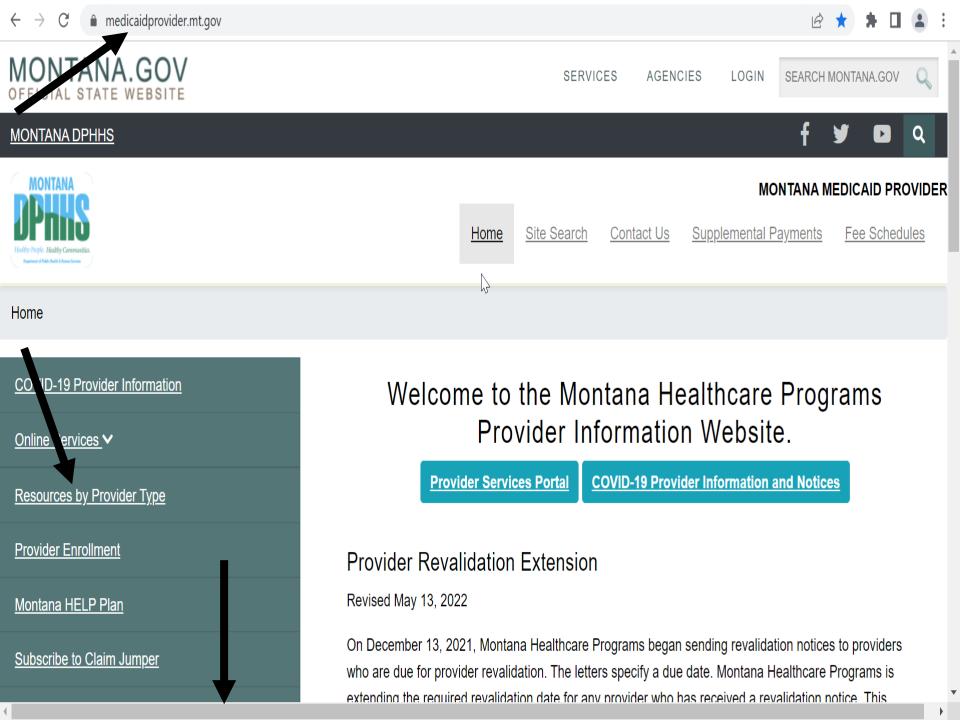
[ARM 37.85.406 (9) & (10)]



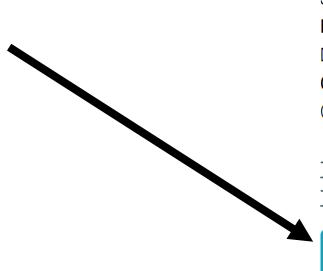
### **Montana Medicaid Website**

https://medicaidprovider.mt.gov/





LOGIN



Jen Tucker, Suks Supervisor, Qad, June To, 2022 at 2pm Mountain Time (T Hour)

#### Billing 101

Deb Braga, Provider Relations Field Rep, Conduent, July 21, 2022 at 2pm (2 Hours)

#### **CSCT Schools**

Christine White, CSCT Medicaid Program Officer, DPHHS, August 18, 2022 at 2pm Mountain Time (1 Hour)

<u>To register for upcoming Online Training and access to previous Training PowerPoints, please visit the Training page at https://medicaidprovider.mt.gov/training.</u>

Recent Website Posts

<u>Announcements</u>

<u>Drug and Pharmacy News</u>

<u>Forms</u>

**Claim Instructions** 

<u>Claim Jumper Newsletters</u>

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#### **COVID-19 Provider Information**

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Online Services V

Resources by Provider Type

Provider Enrollment

Montana HELP Plan

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Site Search

Here you can

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select the

provider type you are looking for.

#### Select Your Provider Type

Provider types are listed in alphabetical order. Available resources include fee schedules, provider notices, provider manuals, and more.

<u>A - C</u>

<u>D - F</u>

<u>G - K</u>

<u>L - 0</u>

<u>P -Q</u>

<u>R - Z</u>

#### Providers A - C

- Ambulance
- Ambulatory Surgical Center
- Applied Behavior Analysis Services
- Audiologist
- Chemical Dependency
- Chiropractor
- Clinic (Public Health)
- Clinical Pharmacist

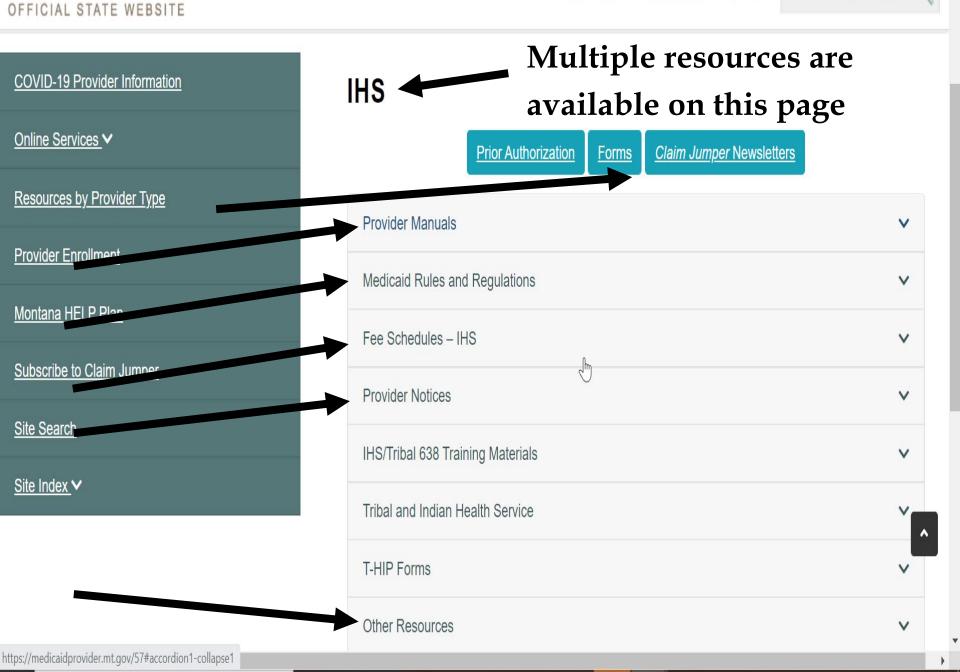
#### Providers D - F

<u>Dental (Dentist, Dental Hygienist)</u>

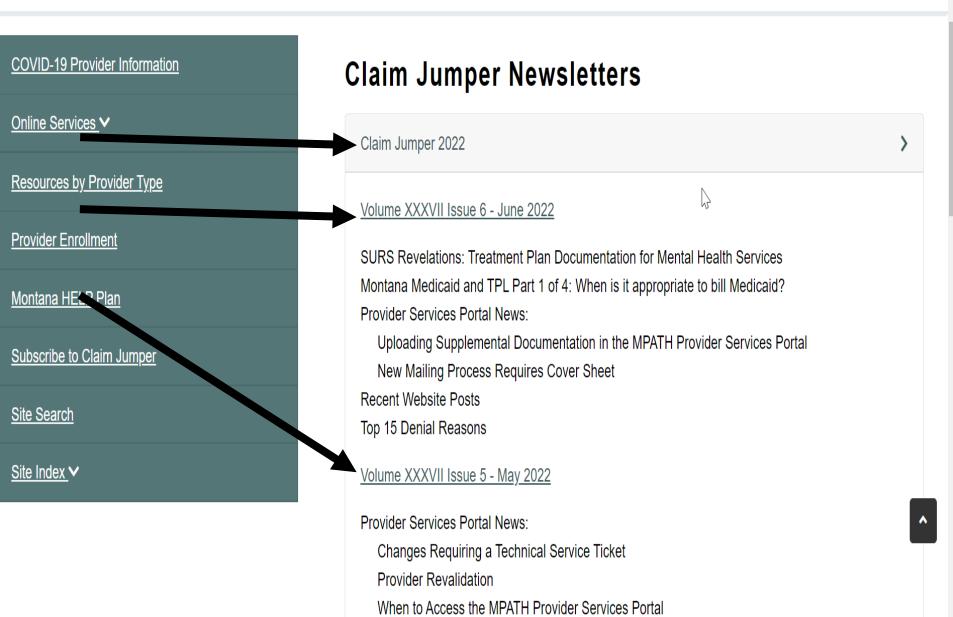
#### Providers L - O

- <u>Laboratory Services</u>
- <u>Licensed Addiction Counselor</u>
- <u>Licensed Marriage and Family Therapist</u>
- <u>Licensed Professional Counselor</u>
- Mental Health Center
- Mid-Level Practitioner
- Mobile Imaging
- Nursing Facility
- Nutritionist (EPSDT)
- Occupational Therapist
- Optician

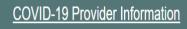




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#### IHS

**Prior Authorization** 

**Forms** 

Claim Jumper Newsletters

Provider Manuals

#### **General Information for Providers**

Medicaid manual with general information for all provider types.

#### Indian Health Service/Tribal 638

This manual has information specific to your provider type.

Tribal Health Improvement Program (T-HIP) Manual

This manual has information specific to your provider type.

#### Prescription Drug Program, Prior Authorization Chapter

Prior authorization requirements and procedures are covered in this chapter.

#### Passport to Health

How to become a successful Passport provider.



Montana HELP Plan

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Claim Jumper Newsletters <u>Forms</u>

Medicaid Rules and Regulations

Code of Federal Regulations (Title 42)

Montana Code Annotated - https://leg.mt.gov/ (Choose "Laws & Bills" then " Montana Statutes -

MCA")

Applicable Section: Title 53, Chapter 6

• Chapter 79 Healthy Montana Kids

Administrative Rules of Montana (Title 37)

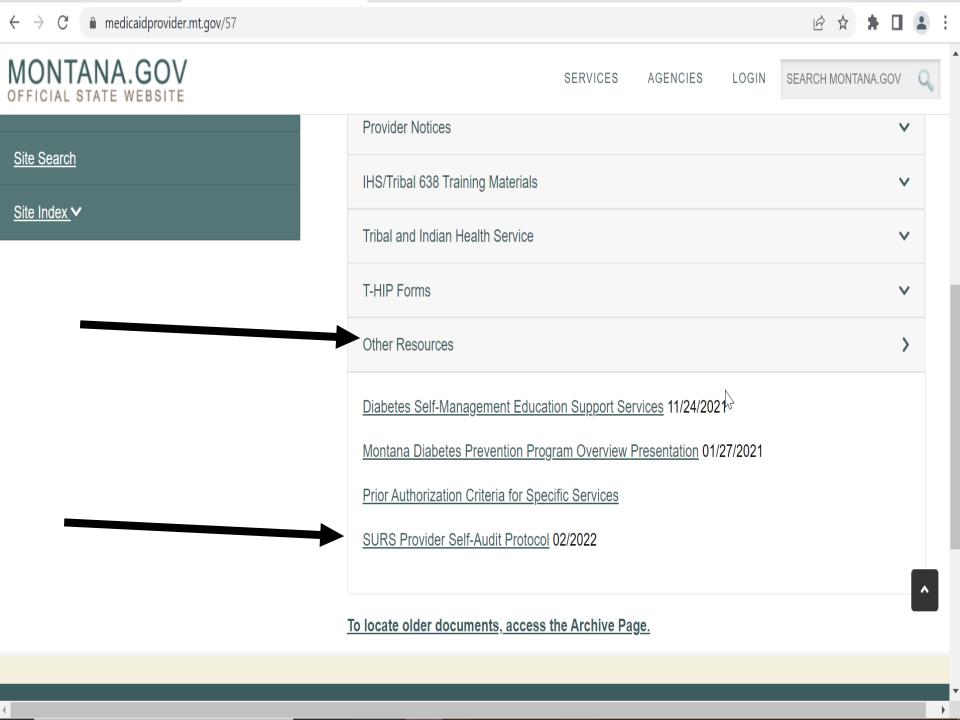
- Chapter 82 Medicaid Eligibility
- Chapter 83 Medicaid for Certain Medicare Beneficiaries and Others
- Chapter 85 General Medicaid Services
- Chapter 86 Medicaid Primary Care Service

Fee Schedules - IHS

MONTANA.GOV SERVICES AGENCIES LOGIN SEARCH MONTANA.GOV **Provider Notices** Site Search 2022 Site Index ✓ 05/16/2022 Help Members Receive Important Information from Montana Medicaid and Stay Covered 05/13/2022 Revalidation Extended REVISED 05/13/2022 National Drug Code (NDC) Denial Errors 05/11/2022 Peer Support Services REISSUED 04/26/2022 <u>Health Behavior Assessment and Intervention Billing Codes REVISED</u> 03/29/2022 Nurse First Advice Line Services Ending 03/16/2022 Revalidation Extended to June 2022 REVISED Rev. 05/13/2022 02/28/2022 COVID-19 At-Home Test Coverage 02/23/2022 Revalidation Extended to June 2022 Rev. 03/16/2022 02/23/2022 Standing Orders and Medicaid Reimbursement 02/02/2022 Dose Limitations for Gabapentinoids 01/14/2022 Montana Healthcare Programs Support Services Holiday Closures 01/03/2022 Non-Therapeutic CGM Devices 2021 12/20/2021 Plan First Updated Code List Descriptions 12/15/2021 Health Behavior Assessment and Intervention Billing Codes Rev. 04/26/2022 12/10/2021 New Provider Services Portal Madicaid Daimhuraamant Opportunity for Dhysical Thorany Sarvisca

https://medicaidprovider.mt.gov/docs/providernotices/2022PN/NurseFirstAdviceLineServicesEnding03292022.pdf

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## Rule/Regulation Materials

- Code of Federal Regulations (CFR)
- Montana Code Annotated (MCA)
- Administrative Rules of Montana (ARM)









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#### **Related Resources**

The Code of Federal Regulations (CFR) annual edition is the codification of the general and permanent rules published in the Federal Register by the departments

#### **Electronic Code of Federal Regulations**

e-CFR data is current as of May 8, 2018

#### **USER NOTICE**

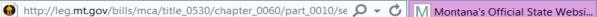
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Title 1 - General Provisions

Need assistance?





Part 1. Medical Assistance -...





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MCA Contents

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MCA Contents / TITLE 53 / CHAPTER 6 / Part 1

#### Montana Code Annotated 2017

TITLE 53. SOCIAL SERVICES AND INSTITUTIONS CHAPTER 6. HEALTH CARE SERVICES

#### Part 1. Medical Assistance -- Medicaid

- 53-6-101 Montana medicaid program -- authorization of services
- 53-6-102 Repealed
- 53-6-103 Repealed
- 53-6-104 Freedom of doctors to treat recipients of medical assistance -- freedom to select doctor
- 53-6-105 Discrimination prohibited
- 53-6-106 Health care facility standards -- definitions
- 53-6-107 Sanctions -- penalties
- 53-6-108 Rules governing sanctions or remedies
- 53-6-109 Consistent regulation of long-term care facilities -- rulemaking authority -- timeframes
- 53-6-110 Report and recommendations on medicaid funding
- 53-6-111 Department charged with administration and supervision of medical assistance program -- overpayment recovery -- sanctions for fraudulent and abusive activities -- adoption of rules
- 53-6-112 Department to print and distribute copies of part and certain forms
- 53-6-113 Department to adopt rules
- 53-6-114 Rules of department binding
- 53-6-115 Contracts with other agencies
- 53-6-116 Medicaid managed care -- capitated health care
- 53-6-117 Participation requirements
- 53-6-118 through 53-6-120 reserved
- 53-6-121 Local administration of medical assistance
- 53-6-122 and 53-6-123 reserved
- 53-6-124 Definitions

http://leg.mt.gov/bills/mca/title\_0530/chapter\_0060/part\_0010/section\_0050/0530-0060-001...

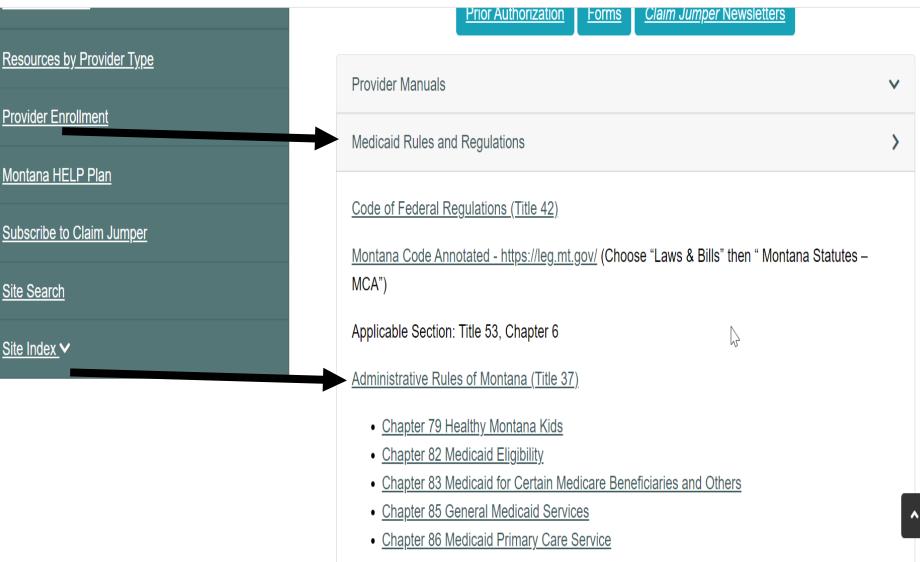
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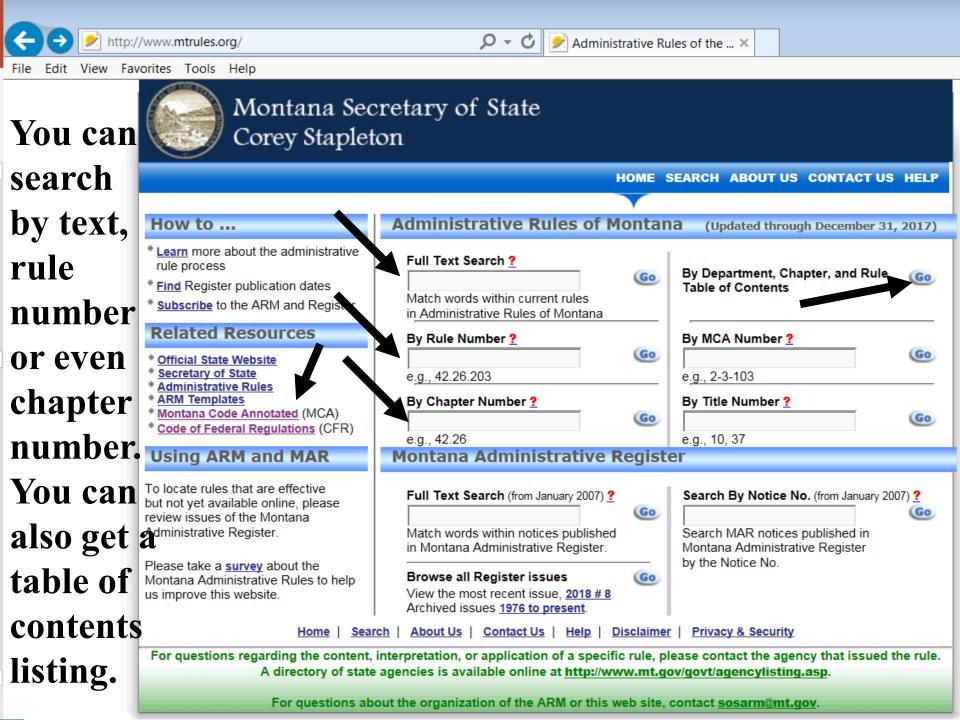
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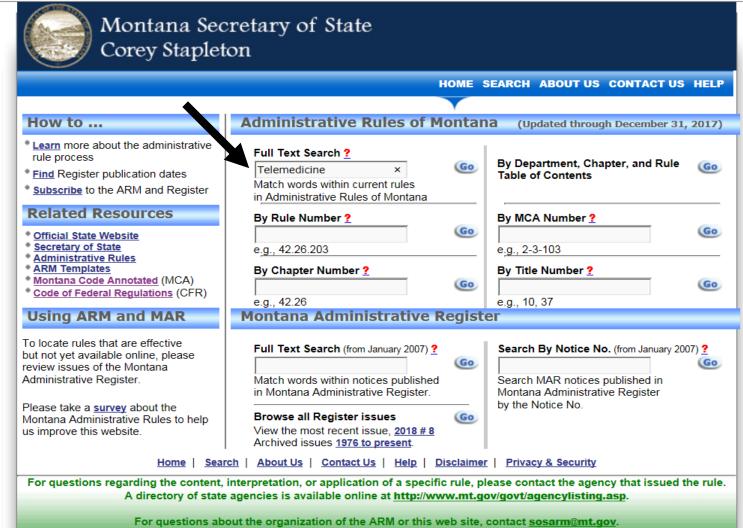
Fee Schedules - IHS





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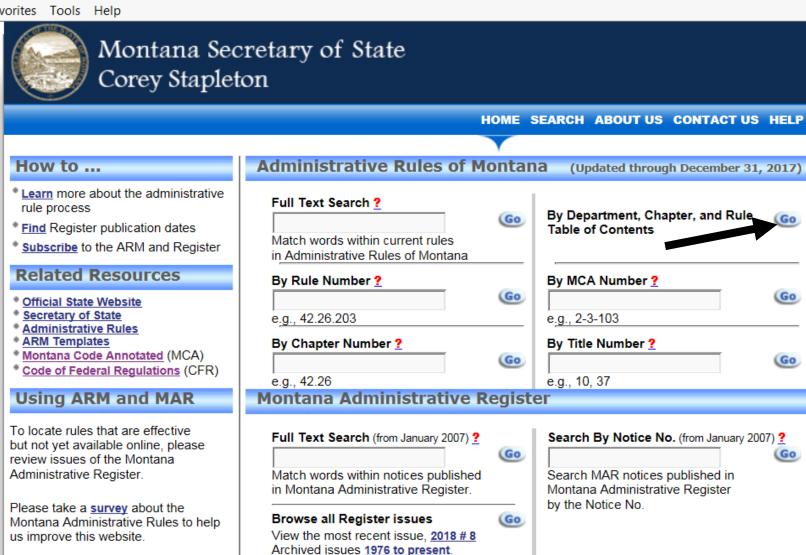
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Rule No.	Rule Title	Rule File	Effective Date
8.28.1904	Application for a Telemedicine Certificate		
8.28.1907	Issuance of Telemedicine Certificate		
8.28.1909	Effect of Denial of Application for Telemedicine Certificate		
8.28.1910	Effect of Telemedicine Certificate		
24.101.413	RENEWAL DATES AND REQUIREMENTS		6/10/2017
24.156.801	PURPOSE AND AUTHORITY		10/27/2000
24.156.802	DEFINITIONS		5/14/2010
24.156.803	LICENSE REQUIREMENT		4/29/2017
24.156.804	APPLICATION FOR A TELEMEDICINE LICENSE		4/29/2017
24.156.805	FEES		4/29/2017
24.156.806	FAILURE TO SUBMIT FEES		4/29/2017
24.156.807	ISSUANCE OF A TELEMEDICINE LICENSE		4/29/2017
24.156.808	RENEWALS		4/29/2017
24.156.809	EFFECT OF DETERMINATION THAT APPLICATION FOR TELEMEDICINE LICENSE DOES NOT MEET REQUIREMENTS		4/29/2017
24.156.810	EFFECT OF TELEMEDICINE LICENSE		5/14/2010
24.156.811	SANCTIONS		4/29/2017
24.156.812	OBLIGATION TO REPORT TO THE BOARD		4/29/2017
37.86.3401	TARGETED CASE MANAGEMENT SERVICES FOR HIGH RISK PREGNANT WOMEN, DEFINITIONS		10/14/2017
<u>37.86.3901</u>	TARGETED CASE MANAGEMENT SERVICES FOR CHILDREN WITH SPECIAL HEALTH CARE NEEDS, DEFINITIONS		10/14/2017

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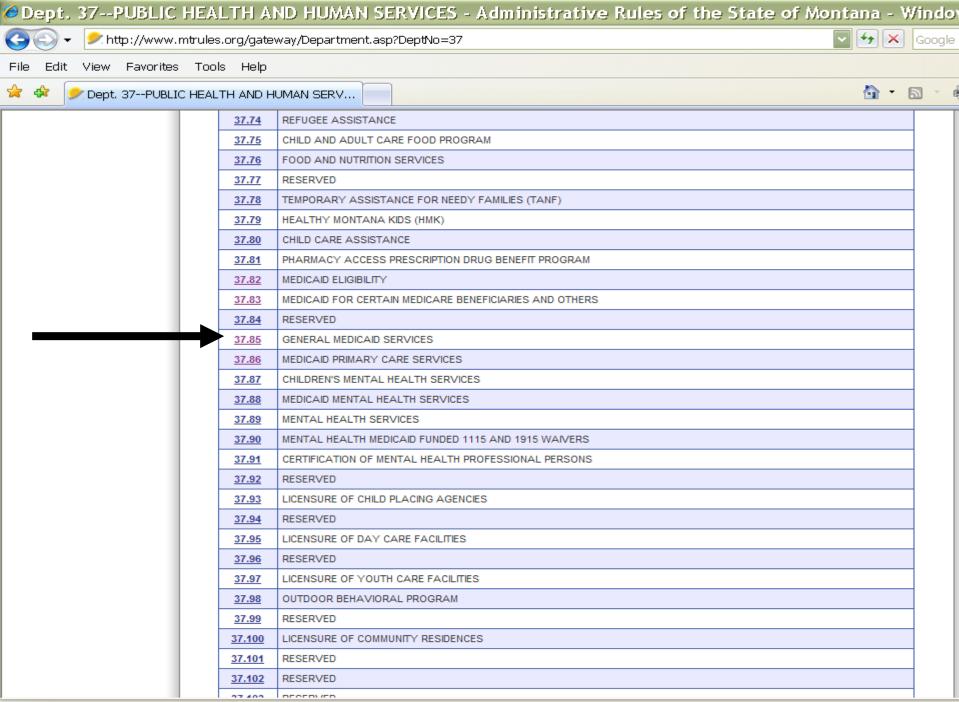
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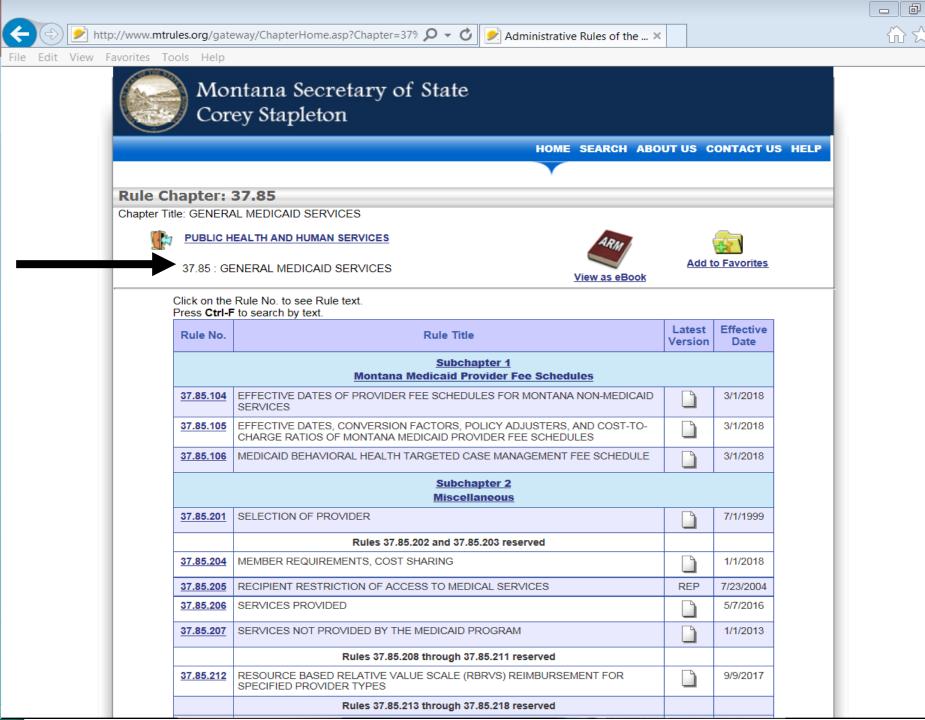
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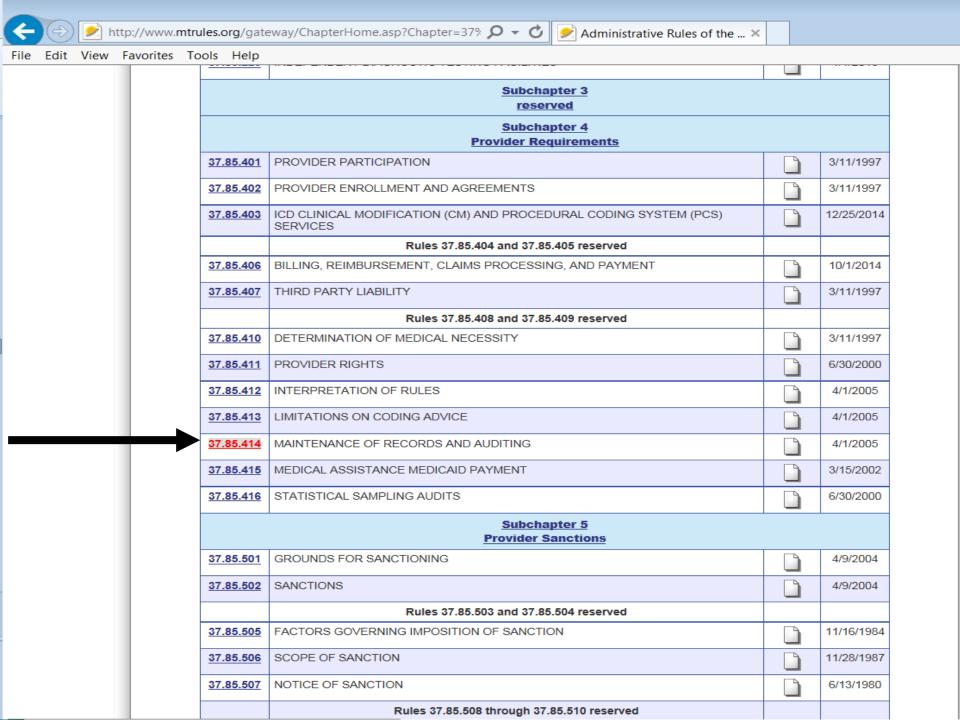
For questions about the organization of the ARM or this web site, contact sosarm@mt.gov.



#### Dept. 37--PUBLIC HEALTH AND HUMAN SERVICES - Administrative Rules of the State of Montana - Window http://www.mtrules.org/gateway/Department.asp?DeptNo=37 Google File Edit View Favorites Tools Help 🎐 Dept. 37--PUBLIC HEALTH AND HUMAN SERV... mt.gov Secretary of State Linda McCulloch **SECRETARY OF STATE** Montana's Official State Website HOME SEARCH COMMENT ABOUTUS CONTACTUS HELP Department: PUBLIC HEALTH AND HUMAN SERVICES 37 : PUBLIC HEALTH AND HUMAN SERVICES Add to Favorites View as eBook Click on the Chapter No. to search the Rules in the Chapter. Click on the table header to re-sort the results. Press Ctrl-F to search by text. Chapter Title Chapter No. 37.1 ORGANIZATIONAL RULE 37.2 DEPARTMENT PROCEDURES 37.3 RESERVED 37.4 RESERVED 37.5 FAIR HEARINGS AND CONTESTED CASE PROCEEDINGS 37.6 RESERVED 37.7 RESERVED 37.8 RECORDS AND STATISTICS







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Rule: 37.85.414

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Rule Title: MAINTENANCE OF RECORDS AND AUDITING

Department: PUBLIC HEALTH AND HUMAN SERVICES, DEPARTMENT OF

Chapter: GENERAL MEDICAID SERVICES

Subchapter: Provider Requirements

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Latest version of the adopted rule presented in Administrative Rules of Montana (ARM):

**Printer Friendly Version** 

#### 37.85.414 MAINTENANCE OF RECORDS AND AUDITING

- (1) All providers of service must maintain records which fully demonstrate the extent, nature and medical necessity of services and items provided to Montana Medicaid recipients. The records must support the fee charged or payment sought for the services and items and demonstrate compliance with all applicable requirements.
- (a) All records which support a claim for a service or item must be complete within 90 days after the date on which the claim was submitted to Medicaid for reimbursement. A record that is required to be signed and dated, including but not limited to an order, prescription, certificate of medical necessity, referral or progress note, is not complete until it has been signed and dated.
- (b) When reimbursement is based on the length of time spent in providing the service, the records must specify the time spent or the time treatment began and ended for each procedure billed to the nearest minute. Total time billed using one or multiple procedure codes may not exceed the total actual time spent with the Medicaid client.
- (c) These records must be retained for a period of at least six years and three months from the date on which the service was rendered or until any dispute or litigation concerning the services is resolved, whichever is later.
- (d) In maintaining financial records, providers shall employ generally accepted accounting methods. Generally accepted accounting methods are those approved by the National Association of Certified Public Accountants.
- (e) The department shall have access to all records so maintained and retained regardless of a provider's continued participation in the program.
- (f) In the event of a change of ownership, the original owner must retain all required records unless an alternative method of providing for the retention of records has been established in writing and approved by the department

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providers must also comply with any specific record keeping requirements applicable to the type of service the provider furnishes, which may be more restrictive than the minimum requirements of this rule.

- (2) In addition to the recipient's medical records, any Medicaid information regarding a recipient or applicant is confidential and shall be used solely for purposes related to the administration of the Montana Medicaid program. This information shall not be divulged by the provider or his employees, to any person, group, or organization other than those listed below or a department representative without the written consent of the recipient or applicant. In addition, the provider must comply with the Health Insurance Portability and Accountability Act of 1996 (HIPAA), 42 USC 1320d et seq., and the Uniform Health Care Information Act, 50-16-501 et seq., MCA.
- (3) The department, the designated review organization, the legislative auditor, the Department of Revenue, the Medicaid fraud control unit, and their legal representatives shall have the right to inspect or evaluate the quality, appropriateness, and timeliness of services performed by providers, and to inspect and audit all records required by this rule.
- (a) Upon the department's request for records, the provider shall submit a true and accurate copy of each record of the service or item being reviewed as it existed within 90 days after the date on which the claim was submitted to Medicaid.
- (b) Refusal to permit inspection, evaluation or audit of services shall result in the imposition of provider sanctions in accordance with the rules of the department.
- (4) The provisions of this rule specifying the length of time for which records must be retained shall not be construed as a limitation on the period in which the department may recover overpayments or impose sanctions.

► History: <u>53-6-113</u>, MCA; <u>IMP</u>, <u>53-2-201</u>, <u>53-6-101</u>, <u>53-6-111</u>, <u>53-6-113</u> and <u>53-6-141</u>, MCA; <u>NEW</u>, 1980 MAR p. 1491, Eff. 5/16/80; <u>AMD</u>, 1997 MAR p. 474, Eff. 3/11/97; <u>TRANS</u>, from SRS, 2000 MAR p. 479; AMD, 2005 MAR p. 459, Eff. 4/1/05.

	MAR Notices	Effective From	Effective To	History Notes
•		4/1/2005	Current	History: <u>53-6-113</u> , MCA; <u>IMP</u> , <u>53-2-201</u> , <u>53-6-101</u> , <u>53-6-111</u> , <u>53-6-113</u> and <u>53-6-141</u> , MCA; <u>NEW</u> , 1980 MAR p. 1491, Eff. 5/16/80; <u>AMD</u> , 1997 MAR p. 474, Eff. 3/11/97; <u>TRANS</u> , from SRS, 2000 MAR p. 479; <u>AMD</u> , 2005 MAR p. 459, Eff. 4/1/05.

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(10) In addition to the above, the department will pay:

- (a) the lesser of either the actual charge for drugs and other prescribed supplies, or the wholesale price cited, less 15%, plus a dispensing fee on the Medicaid point-of-sale system;
- (b) 85% of the cost of durable medical equipment to the appropriate amount when allowing financial assistance, or to the maximum amount set by the program for the federal fiscal year;
- (c) 85% of the cost of specialized formula and foods and prescriptive or nonprescriptive medications prescribed by a physician for inborn errors of metabolism; and
- (d) 85% of the cost of syringes and disposable medical equipment for the treatment of covered conditions.
- (11) A CYSHCN who attends interdisciplinary pediatric specialty clinics, supported by CSHS, is not responsible for copays, deductibles, or coinsurance, nor will they be balance-billed. History: 50-1-202, MCA; IMP, 50-1-202, MCA; NEW, 1990 MAR p. 1256, Eff. 6/29/90; AMD, 1992 MAR p. 919, Eff. 5/1/92; AMD, 1994 MAR p. 1836, Eff. 7/8/94; AMD, 1999 MAR p. 2879, Eff. 12/17/99; TRANS, from DHES, 2001 MAR, p. 398; AMD, 2003 MAR p. 1637, Eff. 8/1/03; AMD, 2003 MAR p. 1637, Eff. 8/1/03; AMD, 2012 MAR p. 1672, Eff. 8/24/12; AMD, 2013 MAR p. 1449, Eff. 8/9/13.

	MAR Notices	Effective From	Effective To	History Notes
	<u>37-641</u>	8/9/2013	Current	History: <u>50-1-202</u> , MCA; <u>IMP</u> , <u>50-1-202</u> , MCA; <u>NEW</u> , 1990 MAR p. 1256, Eff. 6/29/90; <u>AMD</u> , 1992 MAR p. 919, Eff. 5/1/92; <u>AMD</u> , 1994 MAR p. 1836, Eff. 7/8/94; <u>AMD</u> , 1999 MAR p. 2879, Eff. 12/17/99; <u>TRANS</u> , from DHES, 2001 MAR, p. 398; <u>AMD</u> , 2003 MAR p. 1637, Eff. 8/1/03; <u>AMD</u> , 2003 MAR p. 1637, Eff. 8/1/03; <u>AMD</u> , 2013 MAR p. 1449, Eff. 8/9/13.
	<u>37-588</u>	8/24/2012	8/9/2013	History: <u>50-1-202</u> , MCA; <u>IMP</u> , <u>50-1-202</u> , MCA; <u>NEW</u> , 1990 MAR p. 1256, Eff. 6/29/90; <u>AMD</u> , 1992 MAR p. 919, Eff. 5/1/92; <u>AMD</u> , 1994 MAR p. 1836, Eff. 7/8/94; <u>AMD</u> , 1999 MAR p. 2879, Eff. 12/17/99; <u>TRANS</u> , from DHES, 2001 MAR, p. 398; <u>AMD</u> , 2003 MAR p. 1637, Eff. 8/1/03; <u>AMD</u> , 2003 MAR p. 1637, Eff. 8/1/03; <u>AMD</u> , 2012 MAR p. 1672, Eff. 8/24/12.
		<u>8/1/2003</u>	8/24/2012	History: Sec. <u>50-1-202</u> , MCA; <u>IMP</u> , Sec. <u>50-1-202</u> , MCA; <u>NEW</u> , 1990 MAR p. 1256, Eff. 6/29/90; <u>AMD</u> , 1992 MAR p. 919, Eff. 5/1/92; <u>AMD</u> , 1994 MAR p. 1836, Eff. 7/8/94; <u>AMD</u> , 1999 MAR p. 2879, Eff. 12/17/99; <u>TRANS</u> , from DHES, 2001 MAR, p. 398; <u>AMD</u> , 2003 MAR p. 1637, Eff. 8/1/03.

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For questions about the organization of the ARM or this web site, contact sosarm@mt.gov.



## **Coding Reference Materials**

### Some coding reference materials

- CPT and CPT Assistant
- HCPCS
- ICD-10 CM
- ICD-10 PCS
- CDT
- DSM
- Publications or training specific to your specialty.





## "If it isn't documented, it didn't happen."





# Maintain records which demonstrate the extent, nature and medical necessity of services provided [ARM 37.85.414]



DOCUMENT!



**DOCUMENT!** 







## **Record Keeping Tips**

Records cannot be altered and must reflect the services provided. If a record needs to be corrected, a provider should...

- For Written Documentation:
  - Cross out with a single line
  - Write correct information
  - Date and initial the correction



- Add an addendum to the note/documentation indicating what's incorrect and what's correct
- Date and initial the correction





# **Record Keeping Tips**

• Providers must have a contingency plan to ensure the availability of documentation in the event of a loss of medical records.

[ARM 37.85.414]

• Providers must obtain **written** authorization from the Department for any variation from the usual billing practice.

[ARM 37.85.412 and 37.85.413]



ent of Public Health & Human Service:

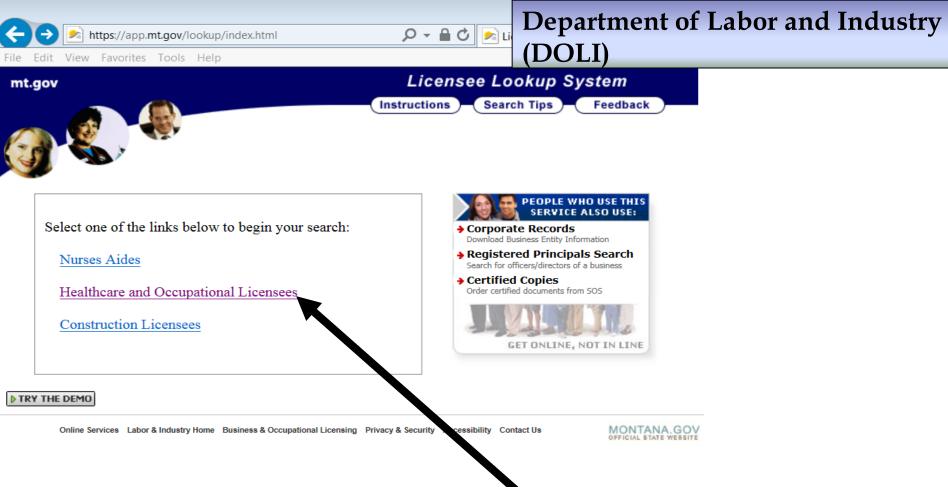
# **Provider Responsibility**

It is the <u>responsibility of the provider</u> to be knowledgeable about sections of the Administrative Rules that relate to their provider type, provider policies and covered services.

In addition, providers are encouraged to ensure their employees are not listed on the federal exclusion databases.

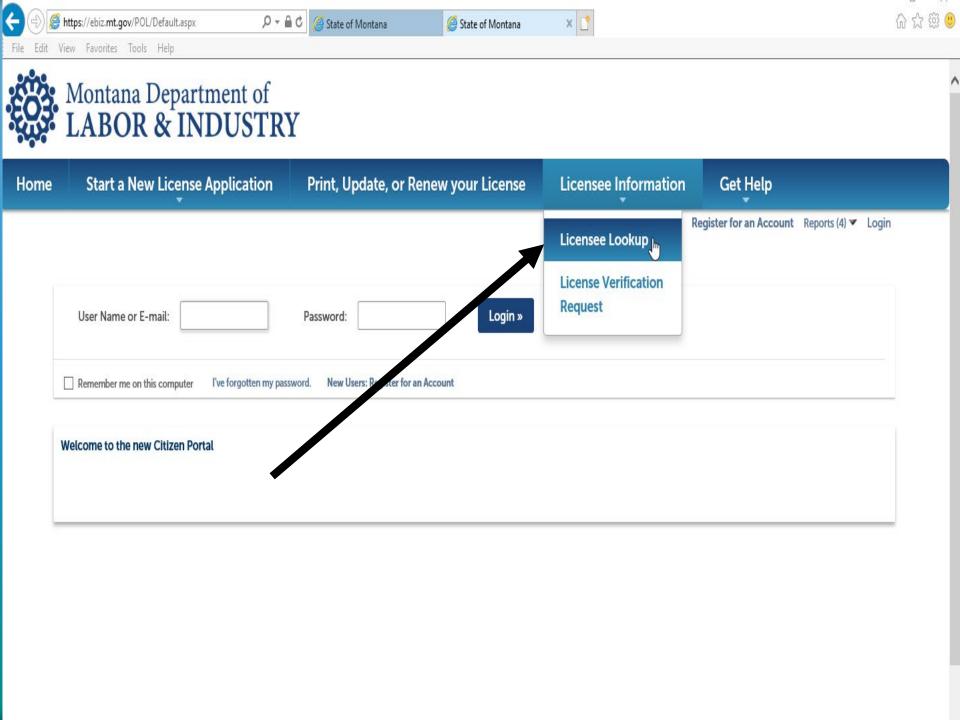
Special Advisory http://oig.hhs.gov/exclusions/advisories.asp

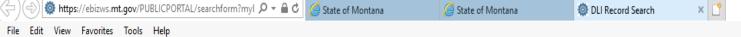
- DOLI (http://app.mt.gov/lookup/index.html)
  - LEIE (http://exclusions.oig.hhs.gov/)
    - SAM (https://www.sam.gov)





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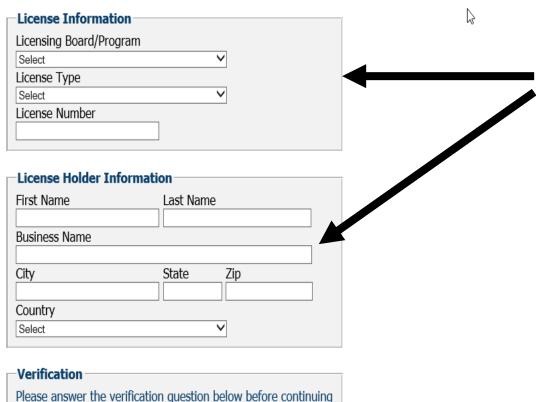


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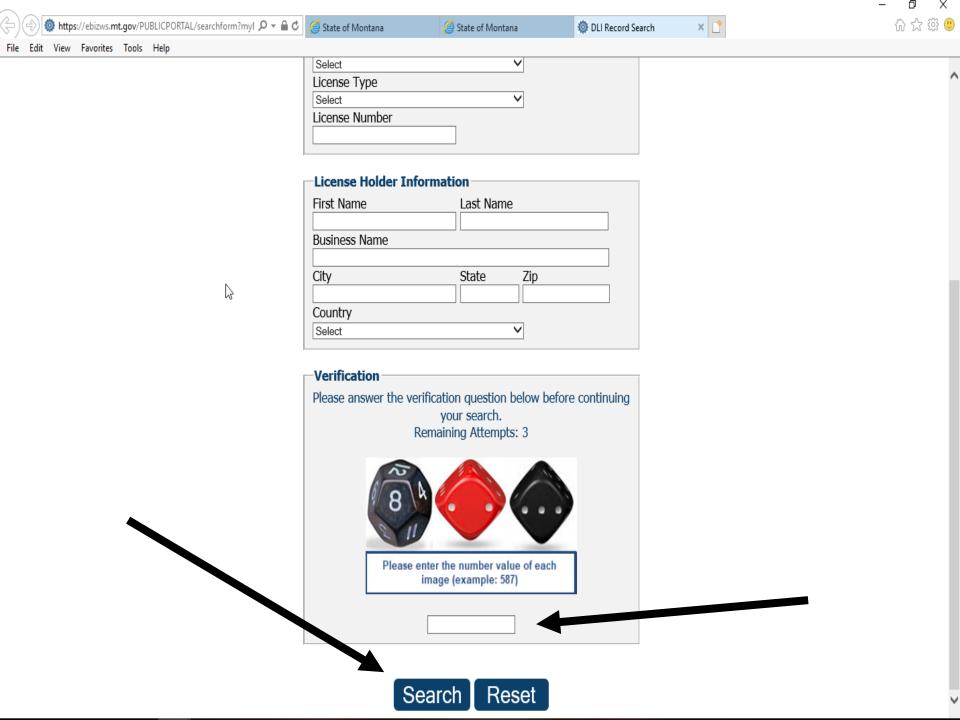
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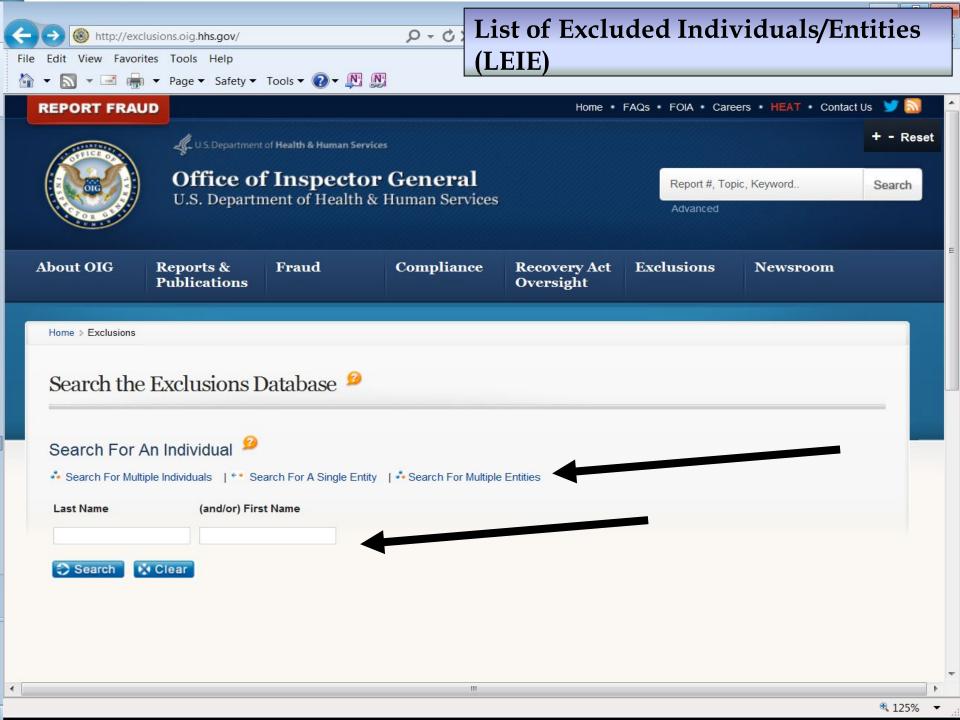
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What is an entity?

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**Please Sign In:** You must sign in to your SAM.gov account to search Entities or the Disaster Response Registry.

Sign In

**Advanced Search** 

Search

All Entity Information e.g. 123456789, Smith Corp

Q

NEW

## Register Your Entity or Get a Unique Entity ID

Register your entity or get a Unique Entity ID to get started doing business with the federal government.

**Get Started** 

**Renew Entity** 

 $\otimes$ 

**Check Registration Status** 

#### **All Entity Information**

Entities

Disaster Response Registry

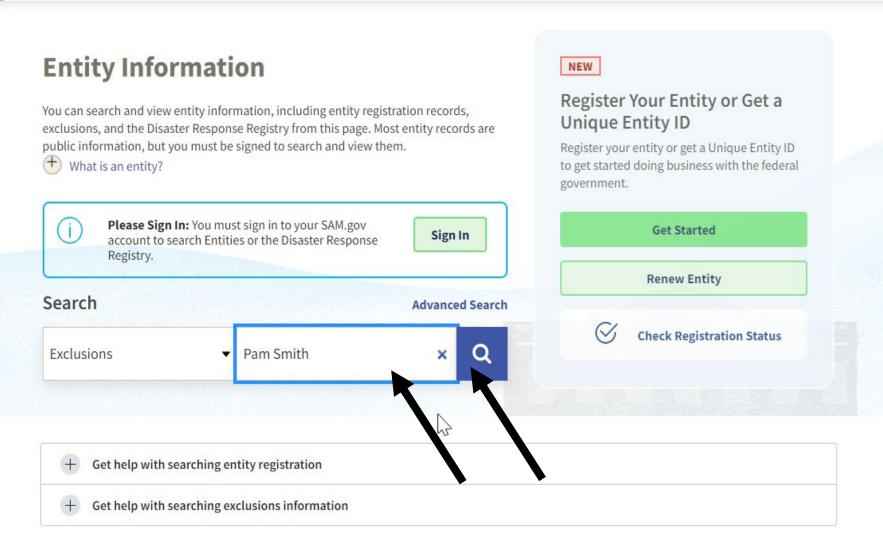
**Exclusions** 

Get her, with searching entity registration

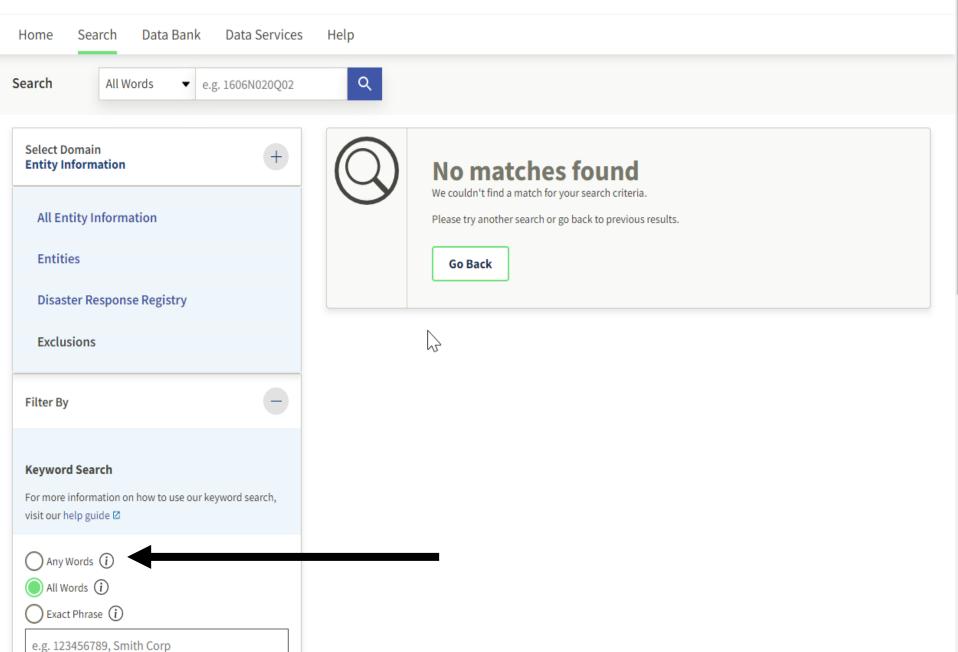
+ Get help with searching exclusions information



Home Search Data Bank Data Services Help









For more information on how to use or

visit our help guide 🛭

Any Words (i)

All Words (i)

Exact Phrase (i)

e.g. 123456789, Smith Corp

Activation Date

Jan 18, 2005

V

Data Services Search Data Bank Help Home Search All Words ▼ e.g. 1606N020Q02 Select Domain + **Entity Information All Entity Information** (blank) **Entities** SAM (blank) **Disaster Response Registry Exclusions** DUNS (blank) SAM Filter By (blank) **Keyword Search** 

keyword search,

SAM Unique Entity ID

Q Sort by Relevance Showing 1 - 25 of 1,160 results Pam Pam • Active Exclusion Unique Entity ID CAGE Code Physical Address Classification (blank) High Ridge, MO 63049 USA Individual Activation Date Unique Entity ID Jan 28, 2020 Termination Date Jan 27, 2023 Pam Archbald • Active Exclusion Unique Entity ID CAGE Code Physical Address Classification Missouri City, TX 77459 USA (blank) Individual Activation Date Unique Entity ID Aug 23, 2019 Termination Date Aug 22, 2022 Pam Richardet • Active Exclusion **DUNS** Unique Entity ID CAGE Code Physical Address Classification (blank) High Ridge, MO 63049 USA Individual (blank) Activation Date Unique Entity ID SAM Jan 28, 2020 Termination Date (blank) Jan 27, 2023 PAM N OLSEN • Active Exclusion DUNS CAGE Code Unique Entity ID Physical Address Classification (blank) PHILADELPHIA, PA 19149 USA Individual (blank)

				Aug 22, 2022
Keyword Search  For more information on how to use our keyword sear visit our help guide ☑	Pam Richardet ● Active  DUNS Unique Entity ID  h, (blank)  SAM Unique Entity ID	CAGE Code (blank)	Physical Address High Ridge, MO 63049 USA	Exclusion  Classification Individual  Activation Date Jan 28, 2020
Any Words (i) All Words (i) Exact Phrase (i)	PAM N OLSEN • Active  DUNS Unique Entity ID  (blank)	CAGE Code (blank)	Physical Address PHILADELPHIA, PA 19149 USA	Termination Date Jan 27, 2023  Exclusion  Classification Individual
e.g. 123456789, Smith Corp  "Pam Smith"	SAM Unique Entity ID  (DIANK)	ı		Activation Date Jan 18, 2005 Termination Date Indefinite
Classification  Excluded Individual  Excluded Entity  Federal Organizations	PAM MARIE NEWPORT • Active  DUNS Unique Entity ID  (blank)  SAM Unique Entity ID  (blank)	ve CAGE Code (blank)	Physical Address SAPULPA, OK 74066 USA	Exclusion  Classification Individual  Activation Date Nov 15, 2004  Termination Date Indefinite
Exclusion Type  Exclusion Program  Location  Dates	Pam W. Walters • Active  DUNS Unique Entity ID  (blank)  SAM Unique Entity ID  (blank)	CAGE Code (blank)	Physical Address Tooele, UT 84074 USA	Exclusion  Classification Individual  Activation Date Aug 6, 1999  Termination Date Indefinite
Res	Exclusion Classification Individual			



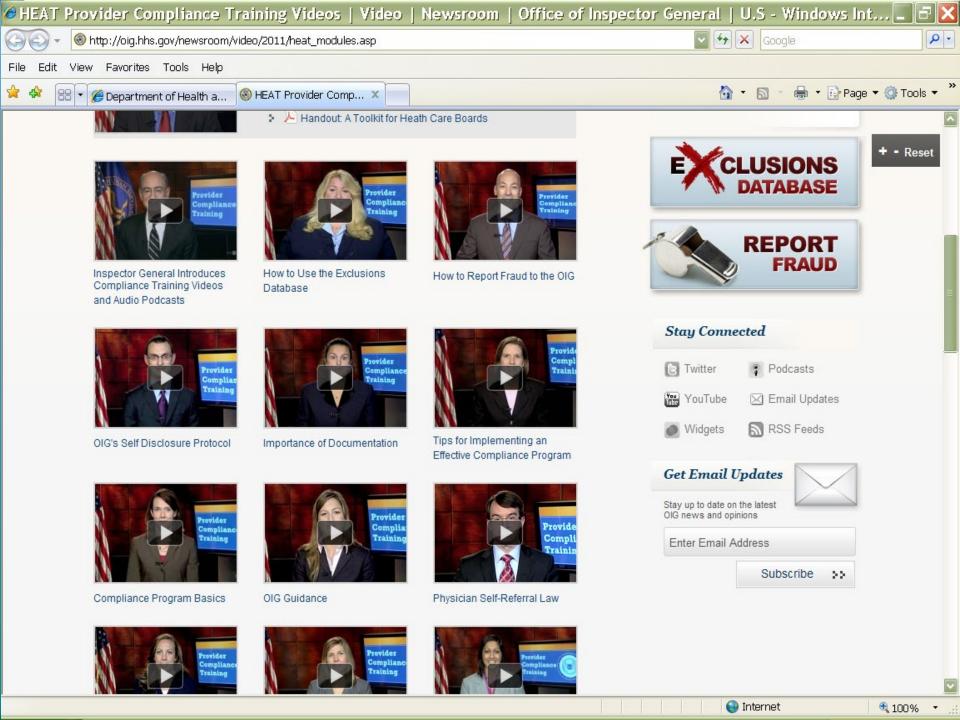
# Health Care Fraud Prevention and Enforcement Action Team (HEAT) Provider Compliance Training

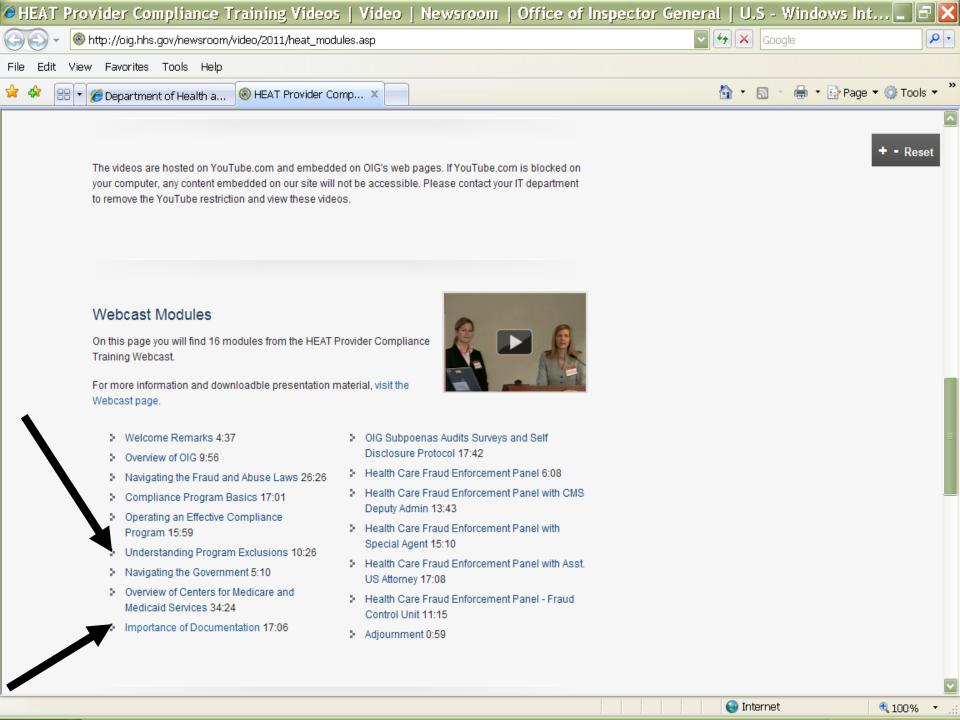
http://oig.hhs.gov/newsroom/video/2011/heat\_modules.asp

- Understanding Program Exclusions
- Importance of Documentation











# **HIPAA**

- American Recovery & Reinvestment Act has many changes for HIPAA [45 CFR, Part 160-164]
  - <a href="http://frwebgate.access.gpo.gov/cgibin/getdoc.cgi?dbname=111\_cong\_bills&docid=f:h1enr.pdf">http://frwebgate.access.gpo.gov/cgibin/getdoc.cgi?dbname=111\_cong\_bills&docid=f:h1enr.pdf</a>
- CMS Website for HIPAA info
  - <a href="http://www.cms.gov/HIPAAGenInfo/">http://www.cms.gov/HIPAAGenInfo/</a>
- Office for Civil Rights Website
  - http://www.hhs.gov/ocr/privacy/index.html

#### Theran Fries

Privacy Officer HIPAA Program Office of Legal Affairs

1-406-444-9503

PO Box 202960 Helena, MT 59620-2960

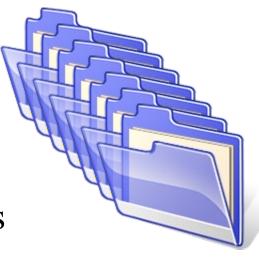




# What are we doing?

### Our unit is consistently working on several projects:

- Team Reviews
- Self Audits
- Individual Reviews
- New Provider Reviews
- Data Reviews
- Active Provider Reviews





# The progression of reviews...

- 1. Review idea
- 2. Collection of data
- 3. Initial contact with provider
- 4. Records request letter
- 5. Records review
- 6. Overpayment letter
- 7. Administrative Review
- 8. Additional records or information review

- 9. Administrative Review determination
- 10. Fair Hearing
- 11. Fair Hearing determination
- 12. Overpayment
- 13. Closure



# Top issues within reviews ...

- Incomplete documentation (demonstrating the extent and nature of the service).
- Incomplete or missing orders/prescriptions.
- Missing dates and signatures on notes or DME delivery confirmation.
- Missing time in and out or full amount of time spent on time-based codes.
- Up-coding Evaluation and Management.
- Identifying information on documentation.





## Additional review errors ...

- Billing for services not personally provided.
- Unbundling of services.
- Illegible records.
- Electronic records out of Word.







## **SURS Staff**

## Jennifer Tucker, CPC, CPIP; SURS Supervisor

- 8 Program Integrity Compliance Specialists
  - Certified Professional Coders
  - Certified Program Integrity Professionals
  - Licensed Practical Nurses

assigned to multiple provider types and specialties





## **False Claims Act Attestation**

- » If you received a letter regarding the Deficit Reduction Act (DRA) Threshold [Section 6032 of the DRA]
  - > This means your organization met or exceeded the \$5 million annual threshold.

#### » What does this mean?

- > Your organization is responsible for creating and distributing written policies to your employees and/or contractors that include detailed information about the whistle blower allowance under the False Claims Act. (1902 (a)(68)(A)
- > An attestation of compliance with Section 6032 of the DRA will accompany the letter. Your organization, after ensuring the policies are in place and distributed, needs to check mark the box and complete the attestation.
- > Return the attestation to DPHHS as indicated.



## **Contact Information**

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#### » Jennifer Tucker, CPC

DPHHS Quality Assurance Division

**SURS Unit** 

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# Questions?

