MACPAC

Medicaid and CHIP Payment and Access Commission

CMS Program Integrity Plan

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Overview

During this session we will:

- Review the updated Comprehensive Medicaid Integrity Plan (CMIP)
- Compare specific elements of the plan to related MACPAC recommendations
- Assess the anticipated effectiveness of the plan
- Identify issues to pursue further

Background

CMS is required to establish a comprehensive Medicaid integrity plan (CMIP) every five years

The FY 2014 – FY 2018 CMIP was published this summer by the Center for Program Integrity

Includes an introduction, executive summary, 3 broad goals and 18 specific activities

Goal 1: Better Leverage Program Data to Protect Medicaid

1.1 Improve the quality and consistency of Medicaid data reported to CMS

1.2 Increase state Medicaid agency access to Medicare program integrity data

1.3 Improve the analysis of Medicaid program data to identify potential fraud, waste, and abuse

Goal 2: Build the Program Integrity Capacity of State Medicaid Agencies

2.1 Streamline CMS assessment of state Medicaid program integrity activities

2.2 Support state oversight of program integrity in Medicaid managed care

2.3 Provide technical assistance for data analysis to state Medicaid agencies

2.4 Expand training of state staff through the Medicaid Integrity Institute

Goal 3: Expand CMS Capacity to Protect Medicaid and Manage Federal Risk

3.1 Eliminate duplication of efforts by integrating Medicare and Medicaid audits

3.2 Improve financial accountability for Medicaid managed care organizations

3.3 Improve safeguards for Medicaid FFS claims

3.4 Expand reporting and controls for provider rate-setting

Goal 3: Expand CMS Capacity to Protect Medicaid and Manage Federal Risk

3.5 Enhance beneficiary eligibility safeguards

3.6 Improve the accuracy of state claiming and grant management

3.7 Execute safeguard strategies for new forms of payment and new delivery systems

3.8 Revised measurement of error rates to align with program changes

CMIP Incorporates Some MACPAC Recommendations

CMS noted in the CMIP that it took into account recommendations made by MACPAC, OIG, GAO, and NAMD

While true, the activities in the CMIP generally reflect only high-level aspects of these recommendations

Many specific MACPAC recommendations were not included or were only partially addressed

CMIP Is Comprehensive in Scope but Lacks Important Detail

Lack of detail will make it difficult for policymakers to monitor progress toward goals

- Little information on how various agencies and offices will be involved or coordinated
- Few timelines, milestones, or performance metrics for most activities
- New areas (e.g., managed care, innovative payment methods) appear the least planned out

Federal Medicaid Program Integrity Strategy Should Be Strengthened

CPI should integrate the catalog of program integrity-related activities across CMS into an overall strategy demonstrating alignment toward common goals among offices/agencies

CPI should prepare and release specific plans for each component of the strategy

CMS should complete the T-MSIS migration

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