Agenda

• Anatomy of a Case
• SIRS Data Summary
• Questions and Answers
Anatomy of a Case

Step 1: Identify a case to refer to the OIG Hotline via ACL

Step 2: Develop the case

Step 3: Submit the case in SIRS

Step 4: ACL follows up

Step 5: The OIG follows up

Step 6: Close the case
Step 1: Identify an SMP Referral to the OIG Hotline via ACL

- Initial conversation with the beneficiary
  - Identify the conversation as an SMP complex interaction
    - See the SMP Counselor Training resources.
  - Identify the SMP complex interaction as a referral to the OIG Hotline
    - See the SMP Complex Interactions Training resources.
1) Is the question related to the SMP mission?

- **NO**
  - This is not an SMP interaction. Send the person to the appropriate entity for help. See Appendix B.

- **YES**
  - This is an SMP individual interaction. See below.

- **MAYBE**
  - If the question is too complex to be sure, send the person to someone at your SMP who handles complex interactions.

2) Can the question be resolved by providing education or information?

- **YES.**
  - This is a basic interaction.

- **NO.**
  - This is a complex interaction.

Is it a Complex Interaction? Use the SMP Counselor Training Manual, Appendix A: Types of SMP Questions Flow Chart
Is it a Referral to the OIG Hotline via ACL? Use the SMP Complex Interactions Training Manual, Appendix A

**MEDIC** = Medicare Drug Integrity Contractor

**CMS RO DOI Liaison** = CMS Regional Office Department of Insurance Liaison
Step 2: Developing the Case

- What makes a good referral?
- Tips on writing good case notes
- Examples of what to do and what not to do when writing case notes
What Makes a Good Referral?

- Who?
- What?
- When?
- Where?
- How?
- Documents
What Makes a Good Referral, continued...

Provide as much information as possible in the fields about the beneficiary, complainant, subject, and any other applicable fields in SIRS.

Collect and upload documentation to substantiate the issue.

Provide great case notes to describe the issue.
Case Notes: What to Do and NOT to Do

**Don’t** provide beneficiary, complainant, or subject contact information in the case notes.

• **Instead…** Enter contact information in the Beneficiary, Complainant, and Subject fields in SIRS.

**Don’t** include detailed information from the MSN.

• **Instead…** Provide the MSN! Upload MSNs and other documentation in SIRS.

**Don’t** be too wordy in the case notes.

• **Instead…** Provide a concise summary to describe the case.
The MSN: A Picture’s Worth 1,000 Words

- Instead of providing all of the details about the MSN in your case notes, provide the MSN!
- The beneficiary can provide a printed copy, an electronic version, or even a screenshot of their MSN, including the beneficiary name, provider name, service date(s), and amounts.
- Be cautious when receiving the MSN or screenshots of the MSN electronically from the beneficiary, since email is not a secure way to send data.
- “Send” the MSN and other documentation to ACL securely by uploading it in SIRS.
## Case Notes: A Concise Summary

### Case Notes
- Be concise! Briefly summarize the situation as the complainant described it to you.
- Be clear! Your case notes need to make sense to someone outside the agency.
- Be objective and factual! Do not enter subjective observations.

### Additional Details
- If you feel it’s useful to provide more details, type them in a separate document and upload the document in SIRS.
- This may include:
  - Actions you take for the complainant and/or that the complainant took on their own behalf.
  - Anything else that you think may be beneficial to ACL, CMS, or the OIG but doesn’t fit in the case notes.

See the SIRS Complex Interactions Job Aid for case notes tips.
Step 3: Submitting the Case in SIRS

All SMP cases involving Medicare fraud are sent to SMP@acl.hhs.gov via SIRS
- See the SIRS Complex Interactions Job Aid
Submitting an OIG Referral in SIRS

- Enter the complex interaction in SIRS.
- Include all applicable data fields and detailed case notes.
- In the “SMP Action” section, select “referral” and “contact OIG,” plus any other boxes that apply.
- In the “Refer to OIG Hotline via ACL” field, select “Yes”.
- The referral is automatically sent to ACL through SIRS and a notification email is automatically sent ACL. You do not need to email ACL.
- If you ever do need to email ACL or the Center about a case, only email the case number.

- **Do NOT provide any personal information in your emails, not even the beneficiary’s name. ACL and the Center have access to look at your case with you in SIRS.**
Key Data Entry Fields in SIRS

a.k.a. “required fields that aren’t marked as required”

✓ Beneficiary contact information
✓ Permission to contact
✓ Subject information
✓ Complainant contact information (if not the beneficiary)
✓ SMP actions
✓ Case notes
✓ Refer to OIG Hotline via ACL = Yes
✓ SMP representative information
✓ Status of Interaction
✓ Date of Last Status Update
TIP: Case Notes and Refer to OIG Hotline via ACL

Case Notes: 

Enter case notes here.

Refer to OIG Hotline via ACL:  Yes  No

OR “Not Yet”!
TIPS: Referrals to the OIG Hotline via ACL

1) Select “Yes” to make a referral to the OIG Hotline. Reminder: Also check the “Contact OIG” and “Referrals” boxes in the “SMP Actions” section.

2) After saving the complex interaction, this message appears at the top of the screen.

3) When you return to the complex interaction later, you can see when the case was referred to the OIG hotline via ACL.
TIPS: Updating Complex Interactions in SIRS

You must log in to SIRS to update a complex interaction to add more information, upload documents, make a referral, close the case, etc.

If YOU entered the complex interaction (e.g. using eFile), you can find it in your Tracking Inbox.

If SOMEONE ELSE entered the complex interaction, you can find it using the Search feature.
TIPS: Updating Complex Interactions in SIRS: Multiple Tabs

- In SIRS, the complex interaction information is provided on multiple tabs (vs. eFile, where everything is on one screen).
  - Tab 1: Interaction
  - Tab 2: Individual Interaction
Updating Complex Interactions **In SIRS**: Multiple Tabs, *continued*

See the SIRS Complex Interactions Job Aid for details.
TIP: Review Your Work: Full Data PDF

1) Open the completed complex interaction.
2) Click “Print Full Data PDF.”
3) The report opens as a PDF for you to review, print, or save as needed.
Step 4: ACL Follows Up

- ACL receives an email from SIRS for each case referred.
- ACL emails the SMP to confirm that the case was received.
- ACL reviews the case in SIRS.
- ACL discusses the case and reaches out to the SMP as needed.
- ACL makes a determination and submits the case to the OIG if applicable.
ACL reviews the case in SIRS

“Full Data PDF”

Documents (“Individual Interaction” tab)

Tip: OIG Hotline complaint form system limitations:
- Maximum total file size = 10 MB
- Compatible file types = .xls, .doc, .pdf, .jpeg, .gif, .png, .tiff
ACL discusses the case and reaches out to the SMP as needed

If additional information is needed, ACL contacts the complex interactions specialist listed in the “SMP representative” section in SIRS.

- All information and documentation should be “sent” to ACL through SIRS.
- If you add information or documentation in SIRS, email ACL at smp@acl.hhs.gov

As needed, the case is discussed within ACL to make a final determination.

<table>
<thead>
<tr>
<th>SMP Representative Name</th>
<th>Heather Flory</th>
</tr>
</thead>
<tbody>
<tr>
<td>SMP Representative Phone Number (xxx-xxx-xxxx)</td>
<td>319-874-6844</td>
</tr>
<tr>
<td>SMP Representative Fax Number (xxx-xxx-xxxx)</td>
<td>319-272-2459</td>
</tr>
<tr>
<td>SMP Representative Email Address</td>
<td><a href="mailto:hflory@smpresource.org">hflory@smpresource.org</a></td>
</tr>
<tr>
<td>SMP Representative Mailing Address</td>
<td>SMP National Resource Center; N</td>
</tr>
</tbody>
</table>
ACL makes a determination and submits the case to the OIG if applicable

**Tip:** Do not email ACL to find out about the status of a referral.

If a referral to the OIG Hotline is not needed, ACL emails the SMP with a recommendation.

If a referral to the OIG Hotline is needed, ACL enters the case in the OIG Hotline’s complaint form. ACL also submits a referral to the FTC if the SMP has not already done so.
ACL completes the OIG Hotline complaint form

SMP Representative Information
ACL completes the OIG Hotline complaint form, *continued*...

Subject Information

- The allegation is against a *
  - Business/Department

Business/Department Allegation is Against

- Business/Department Name *
- Doing Business As (DBA)
- Employer ID Number (EIN)
- Address 1
- Address 2

- City

- State
  - Please Select

- Zip

- Business Phone

- Cell Phone

Next
ACL completes the OIG Hotline complaint form, continued...

Complaint Information

- Health Care Fraud Complaint
- Medical Identity Theft Complaint
ACL completes the OIG Hotline complaint form, continued...

Case notes and files are copied from SIRS.

Up to 5 files may be uploaded.

- 10 MB total
- .xls, .doc, .pdf, .jpeg, .gif, .png, .tiff
Step 5: The OIG Follows Up

It can be months or years before a complaint is entirely resolved.

Make sure your complainant clearly understands the SMP role:
• The final outcomes are outside of SMP control!
Step 6: Closing the Case

- SMP learns that the referral has been resolved.
- SMP gets final documentation to show dollar amounts to report.
- SMP uploads documentation in SIRS and updates the case.
“Required” Fields to Close a Case in SIRS –
Tab 2: Individual Interaction

✓ Dollar amounts to report
  ✓ Cost avoidance, savings, and/or expected recoveries

✓ Explanation of dollar amounts
  ✓ Include file names of documents and page numbers that show original and revised amounts.

✓ Documentation
  ✓ Upload files to document cost avoidance, savings, and/or expected recoveries.
  ✓ For details about which documentation is needed, see the OIG Report Webinar.

✓ Additional Case Notes

✓ Status of Interaction

✓ Date of Last Status Update
Closing a Case in SIRS

See the SIRS Complex Interactions Job Aid and the OIG Report Webinar for details.

| Cost Avoidance on behalf of Medicare, Medicaid, Beneficiaries, or others (xxxx.xx) |
| Expected Medicare Recoveries (xxxx.xx) |
| Expected Medicaid Recoveries (xxxx.xx) |
| Actual Savings to Beneficiaries (xxxx.xx) |
| Other Savings (xxxx.xx) |

Explain: Include file names of documents that show cost avoidance, savings, and recoveries, and page #s that show original and revised amounts.

Add Documents

Case Notes

Status of Interaction

Date of Last Status Update

Closed - Action Taken By Ref: 11/27/2017 (mm/dd/yyyy)
SIRS Data Summary
January – July 2018

- Number of Individual Interactions: 95,433
- Number of Complex Interactions: 14,723
  - 15.4% of all interactions
- Number of Cases Referred to OIG via ACL: 254
  - 1.8% of all complex interactions
- Number of Cases Referred to OIG: 218
  - 86% of all interactions referred to OIG via ACL
Questions and Answers?