

2018 SMP/SHIP

NATIONAL CONFERENCE

August 20–23 • Chicago, IL

SMP Casework Trends, Tips, and Tricks

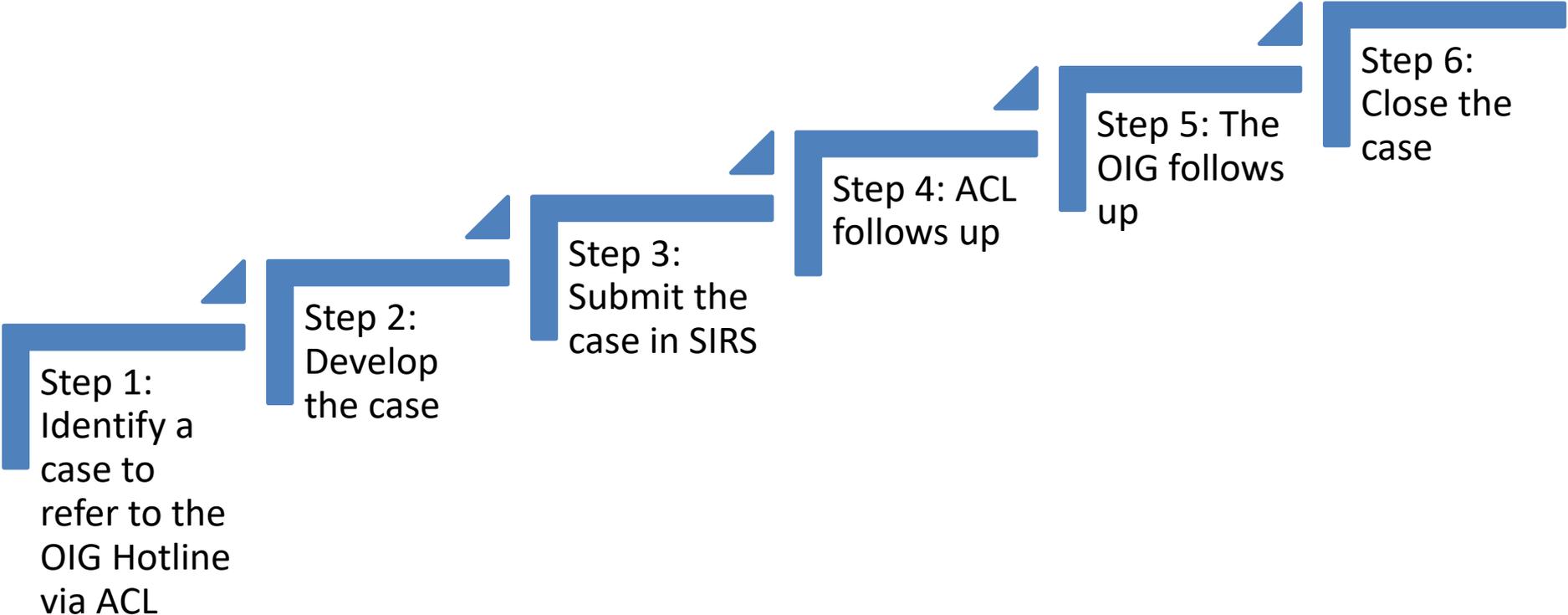
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ACL

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.

Is it a Complex Interaction? Use the SMP Counselor Training Manual, Appendix A: Types of SMP Questions Flow Chart

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 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

Appendix A: SMP Referrals Flow Chart

The chart below shows where to send each type of referral and which chapter to see for details.

Error	<ul style="list-style-type: none"> •Call 1-800-Medicare using your SMP Unique ID to research claims •Resolve with provider unless your research unveils suspected fraud/abuse •See Chapter 2 and Appendix B
DMEPOS Marketing Violation	<ul style="list-style-type: none"> •OIG Hotline via ACL •See Chapter 3
Part C or Part D Marketing Violation	<ul style="list-style-type: none"> •CMS Regional Office Department of Insurance Liaisons •See Chapter 3 and Appendix C
Part C or Part D Fraud by Plan Sponsors or Benefit Managers	<ul style="list-style-type: none"> •CMS Contractor (MEDIC) •See Chapter 3
Compromised Medicare Number	<ul style="list-style-type: none"> •OIG Hotline via ACL •Federal Trade Commission •Local Law Enforcement •See Chapter 3
All Other Medicare Fraud or Abuse	<ul style="list-style-type: none"> •OIG Hotline via ACL •See Chapter 3
Medigap Fraud or Abuse	<ul style="list-style-type: none"> •State Department of Insurance •See Chapter 3
Medicaid Fraud or Abuse	<ul style="list-style-type: none"> •OIG Hotline via ACL AND •Medicaid Fraud Control Unit •State Medicaid Agency if perpetrated by a beneficiary •See Chapter 3
Quality of Care	<ul style="list-style-type: none"> •Beneficiary and Family Centered Care Quality Improvement Organizations (BFCC-QIOs) •State Licensing Boards •State Long-Term Care Ombudsman •See Chapter 3
Consumer Scam?	<ul style="list-style-type: none"> •Not an SMP complex interaction unless one of the topics listed above also applies •See Chapter 1 and the SMP Counselor Training Manual

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.

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See the SIRS Complex Interactions Job Aid for case notes tips.

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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.

OR
"Not Yet"!

Refer to OIG Hotline via ACL:



Yes



No

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.

Refer to OIG Hotline via ACL	<input checked="" type="radio"/> Yes <input type="radio"/> No
Date Submitted to ACL	

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

! OIG has been notified

- An email notification has been sent to the ACL SMP Mailbox for possible referral to the OIG. The notification switch has been turned off, please re-enable it if necessary to send another notification.

3) When you return to the complex interaction later, you can see when the case was referred to the OIG hotline via ACL.

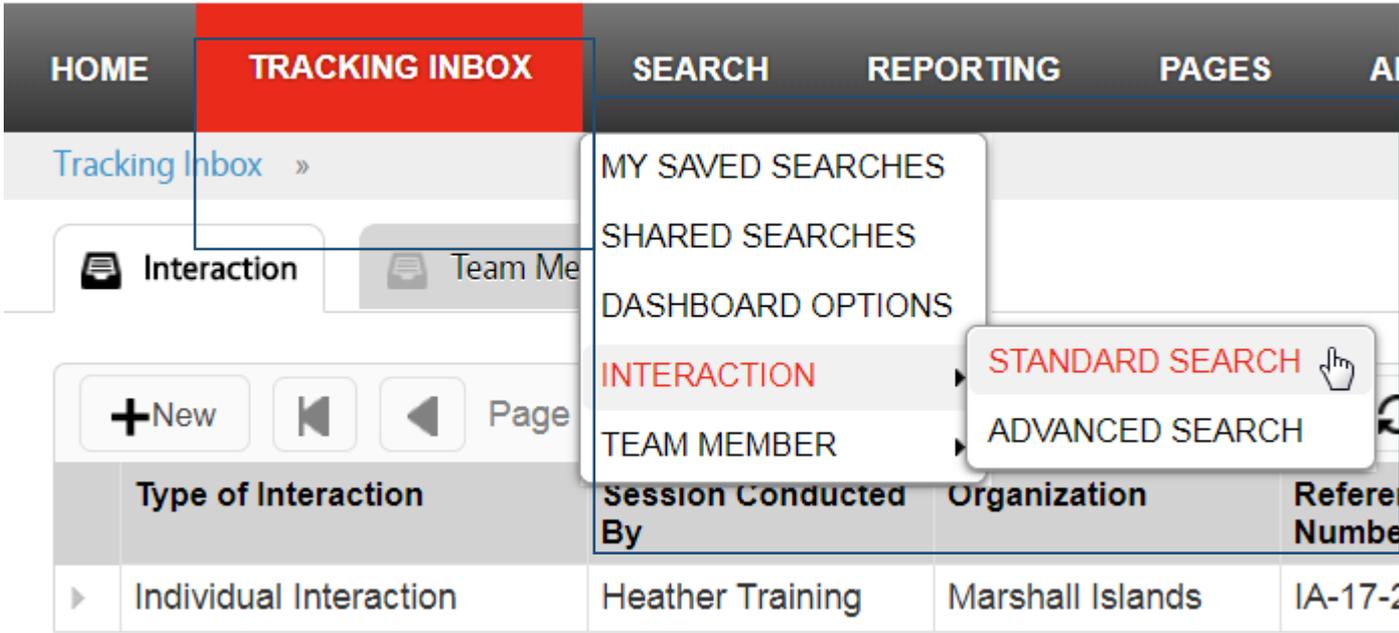
Refer to OIG Hotline via ACL

Yes No

Date Submitted to ACL

07/07/2016 11:51 AM

TIPS: Updating Complex Interactions in SIRS



The screenshot shows the SIRS interface with the 'TRACKING INBOX' tab selected. A search dropdown menu is open, showing options: 'MY SAVED SEARCHES', 'SHARED SEARCHES', 'DASHBOARD OPTIONS', 'INTERACTION' (highlighted in red), and 'TEAM MEMBER'. A sub-menu for 'INTERACTION' is also open, showing 'STANDARD SEARCH' (with a mouse cursor) and 'ADVANCED SEARCH'. Below the menu, a table displays interaction data:

Type of Interaction	Session Conducted By	Organization	Refere Number
▶ Individual Interaction	Heather Training	Marshall Islands	IA-17-2

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.

HOME TRACKING INTERACTIONS SEARCH REPORTING ADMINISTRATION

1 2

Interaction Individual Interaction Audit Log Assignments

Caution: This interaction will not be completed until you have finished entering and saving the necessary information on the next page

Type of Interaction* Individual Interaction R

Session Conducted By* Captain America R

Date of Interaction* 06/16/2017 (mm/dd/yyyy) R

End Date (If Applicable) (mm/dd/yyyy)

Zip Code* 50613 R

State* Iowa R

County Black Hawk - IA

Title of Interaction test

Time Spent in Hours

Time Spent in Minutes

Calculated Time Spent (Minutes)* 105 R

Reference Number IA-17-257

Organization Marshall Islands

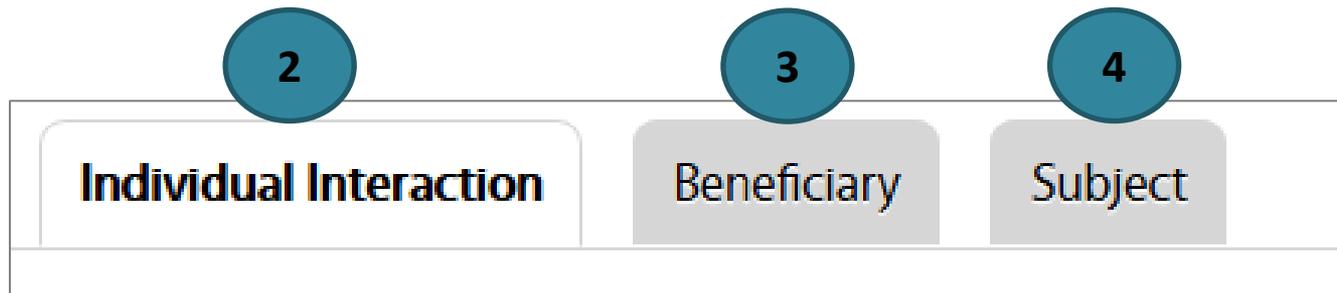
Notes test

Continue Delete

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

HOME TRACKING INBOX SEARCH REPORTING ADMINISTRATION

Tracking Inbox » Interaction (complex interaction test IA-17-248) »

Interaction Individual Interaction Audit Log Assignments

Caution: This is a warning message about saving the report.

Interaction	
Type of Interaction	Individual Interaction
State Location	Iowa
Date of Interaction	27 Apr 2017
Label	complex interaction test
Notes	test
Case Number	IA-17-248
County Location	Black Hawk - IA
Time Spent	50
Organization	Marshall Islands
Conducting User	Bruce Lee
Zip Code	50702
Interaction - Individual Interaction	

Assignment: SMP Director

 [Printer Friendly Format](#)

[Print 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)

Interaction	
Type of Interaction	Individual Interaction
State Location	Iowa
Date of Interaction	27 Apr 2017
Label	complex interaction test
Notes	test
Case Number	IA-17-248
County Location	Black Hawk - IA
Time Spent	50
Organization	Marshall Islands
Conducting User	Bruce Lee
Zip Code	50702

Add Documents

Add Documents

Add Documents

Add Documents

Add Documents

 [Smith MSN July 2017.docx](#) [Replace]

 [Additional case notes.docx](#) [Replace]

Tip: OIG Hotline complaint form system limitations:

- Maximum total file size = 10 MB
- Compatible file types = .xls, .doc, .pdf, .jpeg, .gif, .png, .tiff

Interaction - Individual Interaction	
--------------------------------------	--

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.

SMP Representative Name	Heather Flory
SMP Representative Phone Number (xxx-xxx-xxxx)	319-874-6844
SMP Representative Fax Number (xxx-xxx-xxxx)	319-272-2459
SMP Representative Email Address	hflory@smpresource.org
SMP Representative Mailing Address	SMP National Resource Center; N

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

Home > Fraud > Report Fraud > Report Fraud Form >

Report Fraud Form

Information About You

Please Select One:

I choose to identify myself for the complaint

I choose to provide my complaint anonymously

Information About You

First Name:^{*}
...

Last Name:^{*}
...

Company:

Address1:^{*}
...

Address2:

City:^{*}
..

State:^{*}
...

Please Select ▾

Zip:^{*}
..

Phone:^{*}
..

Cell Phone:

Email:

If an investigator needs to contact you, what is the best time to reach you?:

Please Select ▾

The information I provide will be correct to the best of my knowledge. I understand that intentionally providing false information could be a violation of law (18 U.S. Code Section 1001).

Next

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

Subject Information

The allegation is against a ^{*}
...

Business/Department Allegation is Against

Business/Department Name ^{*}
...

Doing Business As (DBA)

Employer ID Number (EIN)

Address 1

Address 2

City

State

Zip

Business Phone

Cell Phone

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

Type of Complaint

Health Care Fraud Complaint ▼

Program *

Please Select ▼

Medicare/Medicaid # (if known)

Program Type *

Please Select ▼

Type of Allegation *

Please Select ▼

Your Relationship to Subject *

Please Select ▼

Are there any other witnesses? *

Please Select ▼

Has this been previously reported to anyone? *

Please Select ▼

Has this subject previously been investigated? *

Please Select ▼

Complaint Information

- Health Care Fraud Complaint
- Medical Identity Theft Complaint

Type of Complaint

Medical Identity Theft Complaint ▼

Are there any other witnesses? *

Please Select ▼

Has this been previously reported to anyone? *

Please Select ▼

When did this occur?

How long has this been going on

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

Complaint Narrative (Please Describe the Fraud or Complaint) *

....

File Uploading Guidelines

The HHS-OIG Hotline will only accept these file types electronically: .xls, .doc, .pdf, .jpeg, .gif, .png, .tiff

All other file types - including audio, video and ZIP files - are not accepted.

Additionally, there are size limits: the maximum size allowed for an individual file is 10MB, the size of all uploaded files combined cannot exceed 10MB, and the maximum number of files that can be uploaded is five.

Choose Files No file chosen

Start upload Cancel upload

Once your selected file(s) appear below, you MUST press the START UPLOAD button before you click on the SUBMIT NOW button in order for your attachments to be sent to us electronically.

Submit Fraud Report

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

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)

Explanation

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

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

Add Documents

Browse

Case Notes

Update case notes with final information!

Status of Interaction

Closed- Action Taken By Ref 

Date of Last Status Update

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?