

## **PI - Investigation Process**

### **Purpose:**

The purpose is to explain the process whereby investigations are conducted within the Program Integrity Unit (PI).

### **Identification of Roles:**

IME Program Integrity (PI) Unit—conducts investigations as determined to be appropriate.

Medicaid Fraud Control Unit (MFCU)—serve as resource if needed.

### **Performance Standards:**

Initiate investigations within one business day of receipt of referral

### **Path of Business Procedure:**

The PI Unit investigates all referrals received by multiple sources in accordance with RFP MED-10-013. The PI unit employs an Investigator for this function and has a designated back-up for times when the Investigator is not available.

### **Conducting Investigation**

- Step 1. The Investigator or designated back-up is the entry point for all referrals received by the PI Unit. Referrals may come from a variety of sources including the following:
- a. PI Email – The Investigator or back-up is responsible for monitoring the mail received via the internet.
  - b. PI Fraud Hotline – The Investigator is responsible for taking all calls received via the hotline. This position is first in the hunt group with the designated back-up being second in the group.
  - c. State Fraud Hotline – The State of Iowa has a call center in Council Bluffs that takes calls regarding both provider and member fraud. The call center forwards provider fraud complaints to the PI unit. The Investigator or back-up is responsible for the intake of these complaints.
  - d. Internal Referrals – Referrals may initiate from internal resources including Policy staff, Medical Services, Provider Cost Audit, Provider Services, etc. The Investigator or back-up is responsible for the intake of all internal referrals.

- e. MFCU Referral – MFCU at times will forward issues to the PI Unit for administrative review. The Investigator or back-up is responsible for the intake of all MFCU referrals.

Step 2. At the time a referral is received, the Investigator conducts a preliminary review and gathers as much information as possible to support the allegations contained in the referral document. Whenever possible, the Investigator will make contact with the source of the referral via the phone to discuss the allegation in more detail and gather as much information as possible. Sources for information gathering include:

- a. Date Referral Received
- b. Provider Name
- c. Provider National Provider Identifier (NPI)
- d. Provider Address
- e. Provider Type
- f. Referral Source Information (name and contact information)
- g. Description of fraudulent activity
- h. Past 12 Months Reimbursement
- i. State Policy Contact for the Issue
- j. Past Program Integrity Activity with the Provider

This information is collected and documented using the MFCU Referral Checklist. The checklist is located at P: Case Files/Reviews in Process/Referrals.

Step 3. After the preliminary review, the Investigator or back-up will enter the referral into the PI Database along with an OnBase entry. These must be entered within one business day of receipt. Referrals are easily tracked within the PI Database based on the naming convention used by the Unit. All cases initiated via referral have a “R” in the tracking methodology. For instance, a referral on a CDAC would be named PR 99R\_10 Smith. This would mean as follows:

- a. 99 – Waiver Provider
- b. R – Referral
- c. 10 – 10<sup>th</sup> Waiver Provider Referral
- d. Smith – Last name of the Provider

Additionally, within the PI Database there is a review source indicator. There are several options that can be chosen that signify the review was initiated due to a referral. Reports can be run from the PI Database that will indicate which reviews are referral based and the actual status of the review. For example, whether it is an accepted MFCU investigation or it is being reviewed via the PI Surveillance Utilization Review Services (SURS) function.

Step 4. All documentation related to the investigation is kept hardcopy and what can be stored electronically in a folder specific to the referral on the P: Drive. Documentation is also stored in OnBase for case-related items that come via the mail. When the file is scanned for closure, the entire folder is stored electronically in OnBase.

Step 5. There are two scheduled meetings that the Investigator or designated back-up will be responsible for conducting. On a bi-weekly basis, a meeting takes place with the PI Director, Unit Manager and PI Manager. The Investigator supplies the attendees with an agenda of referrals to be discussed on the afternoon prior to the scheduled meeting. This meeting gives the State staff an opportunity to discuss and give feedback to the Investigator on all referrals received in the prior two weeks.

The Investigator will also be responsible for conducting a bi-weekly meeting to discuss new referrals, pending investigations and approved cost avoidance projects. This meeting is attended by a wider audience including, State PI staff, MFCU, State Assistant Attorney General, Magellan and PI staff. The Investigator is responsible for generating an agenda for the meeting that is distributed via email the morning of the meeting. Tasks assigned to the PI Unit after this meeting will be the responsibility of the Investigator. The Investigator and PI Account Manager are responsible for the approval and distribution of the meeting minutes.

Step 6. After the bi-weekly meeting, the MFCU will give the PI Unit an indication of the cases that they will open for future investigation. For those that MFCU does open, the following steps must be completed:

- a. Change the status in the PI Database indicating it is a MFCU case.
- b. Include a note in the PI Database stating that the case is being accepted by MFCU.
- c. Send MFCU all documentation accumulated in the preliminary investigation, including the MFCU Referral Checklist

Step 7. If the referral is not accepted by MFCU, discuss the information with the Operations Manager to determine if a SURS documentation review will be opened. If the referral is not going to be opened as a SURS documentation review, close the review in the PI Database. If it is determined that a SURS documentation review will occur, complete the following:

- a. Change the status in the PI database to preliminary review.
- b. Change the Reviewer status to "to be assigned".
- c. Discuss with the Operations Manager the claim sample to be reviewed.
- d. Complete a PI Form related to the review.

- e. Prepare and send a Medical Records Request letter based on the determined claim sample.

Step 8. In addition to the information received via the referral process, there is an expectation that the Investigator will complete Internet searches and attend quarterly Health Care Task Force meetings to learn of known fraud schemes. As deemed necessary after discussions with the Operations Manager, data queries will be requested from the Database Administrator. The Investigator will analyze the data and present any unusual findings to MFCU. These queries may also lead to SURS documentation reviews.

**Forms/Reports:**

[\\dhs\imeuniversal\Operational Procedures\Program Integrity\Forms and Letters\Approved Forms\Forms\MFCU Referral Checklist.doc](#)

**RFP Reference:**

6.5.2

**Interfaces:**

Program Integrity  
State Policy  
MFCU

**Attachments:**

None