Program Integrity Compliance Plan

[MCP Name]

[Date]

Scope

Goals and objectives and how to plan with contractual requirements that is consistent wit State and Federal regulations. Safeguards in place to ensure payments for services are appropriate.

Mission Statement

What is the Iowa specific mission?

Definitions

Define acronyms used in the document and any other terms that need to be defined.

MCP Overview

Provide your organizational structure for Iowa Program Integrity, including the SIU unit. Name key personnel, management, and investigations and provide job descriptions and duties for the named individuals. Include education and experience requirements for the named personnel.

Communications

Outline your communication plan for Iowa Program Integrity, SIU Manager, and Compliance Officer. This would include your communication process workflow for program integrity activities. For example, a TIP comes in and it is communicated to X, then X communicates to Y, etc.

Program integrity activities

Detection and Investigation Overview

Want the end-to-end process on how they detect and investigate all Iowa tips and referrals received by the various sources. Include the overpayment recovery process (high-level business flow).

Movement of Cases

Provide an overview of moving cases after MFCU has declined and/or closed the case and sent it back to you for recovery.

Campaigns/Projects

Identify goals for preventing FWA in Iowa. Describe the campaigns and projects to prevent FWA. Identify any focused reviews to be performed as a result of FWA prevention activities. Identify activities and safeguards to ensure services were rendered.

Analytics

Describe the analytics plan used for preventing FWA.

Explanation of Benefits (EOBs)

Describe the process for sending out EOBs to members and ensuring services paid for were provided to the member.

Onsite

Describe methodology when conducting onsite audit with providers regarding Iowa FWA.

Other Program integrity Activities

Partnership and Collaboration

Identify your collaboration and coordination activities with external partners combating FWA.

Education and Training

Describe your education and training program for your internal staff, providers, members, subcontractors regarding program integrity. Include the type of education and training, frequency, and who is the audience. Proof of training should be available upon request.

mitigation Plan and Risk Identification

Describe methodology for identifying and addressing vulnerabilities in your program integrity processes.

Appendices

Attach a list of pertinent health care fraud laws and state and federal regulations. Provide policies and procedures pertaining to Iowa Program Integrity activities.