

PI - Overpayments, DIA and MFCU Recoveries

Purpose:

I. This procedure describes the process used by the Iowa Medicaid Program Integrity (PI) Unit for recording checks, representing Medicaid recoveries by the Medicaid Fraud Control Unit (MFCU), submitted by providers through the courts.

Identification of Roles:

RACI Definitions	
RACI - RACI charts are a type of responsibility assignment matrices in project management. These simple spreadsheets or tables highlight the different states of responsibility a stakeholder has over a particular task or deliverable and denotes it with the letters R, A, C, or I.	
(R)	Responsible
(A)	Accountable
(C)	Consulted
(I)	Informed

Iowa Medicaid PI Financial Analyst – receives PDF image files of all MFCU checks received and processed by the fraud unit, usually twice per month. A few checks submitted on behalf of MFCU cases will continue to come directly to the Iowa Medicaid.
(R)

Performance Standards:

Index all checks related to MFCU cases that continue to come directly to Iowa Medicaid, within one business day of their entry into OnBase. Post all checks contained in PDF images from MFCU by the last business day of the current month.

Path of Business Procedure:

1. The Department of Human Services (DHS) and the Department of Inspections and Appeals (DIA) have an Intergovernmental Agreement that provides the baseline for operations and responsibilities between departments for Medicaid Fraud and Abuse-related activities.
2. The MFCU conducts criminal fraud investigations that can lead to prosecution of medical providers. The outcomes of criminal proceedings may result in court-ordered restitution. Civil administrative procedures and court-ordered remedies occur as well. The money recovered by the Iowa Courts and the United States Attorney's Office reimburses to the Medicaid program. The federal government shares in a portion of these recoveries (i.e., federal financial participation) after the overpayments have been returned to the Medicaid Program.

3. Both Iowa Medicaid and the MFCU have a Point-of-Contact (POC) person to enhance administrative cooperation and issues resolution between the agencies. One of the duties of each POC is acting as a liaison to ensure the transfer and delivery of Medicaid recovered funds to the appropriate resource for deposit and tracking purposes.
4. Effective March 1, 2018, checks that are in response to court-ordered restitution and settlement agreements by the United States Attorney(s) are processed and deposited by the MFCU, replacing the process of having these checks deposited at Iowa Medicaid. When such checks are received, the MFCU POC sends a PDF image of all MFCU checks to Iowa Medicaid PI POC by way of electronic mail. This is usually done twice per month, around the 10th of the month and again around the 21st or 22nd of the month. The analyst saves this MFCU check PDF file in a recovery checks folder for MFCU on the SURS network drive. The file path is: SURS > MFCU > Incoming Recovery Checks > Checks Processed at MFCU Start 03_2018. Along with the check PDF package, MFCU also sends a copy of their current Payments Ledger to allow Iowa Medicaid PI Unit an opportunity to reconcile Iowa Medicaid MFCU check records with those of MFCU.
5. There are still a small number of MFCU checks mailed directly to Iowa Medicaid. The PI Financial Analyst, or designee, indexes each such MFCU check into OnBase, following the regularly established process for check indexing. The category for indexing MFCU checks is #18. The check description is Fraud & Abuse.
6. The PI Financial Analyst records each recovery (both PDF check images and checks sent directly to Iowa Medicaid) into a MFCU A/R database, maintained by Iowa Medicaid PI unit on behalf of the MFCU. The MFCU A/R Database is an Access database set up in the exact same format as the PI A/R Database. Refer to the procedure, "Provider Refund Checks, Identifying and Processing". The steps required to enter MFCU check information then follow the same path within the MFCU A/R database as does check information within the PI A/R database. The MFCU A/R database is found at PI([\\Dhsime](#)) > SURS > Data Warehouse > Access Databases > SURSFraudUnitAcctsRec. A screen shot of the MFCU A/R database data entry form is included at the end of this procedure.
7. At the same time MFCU recovery checks are recorded into the MFCU A/R database, the analyst records these recoveries into the MFCU Investigations tab of the Performance Tracking Workbook. This workbook, as discussed in other PI procedures, is intended to provide a comprehensive summary of all recoveries made by both the Iowa Medicaid and the Medicaid Fraud Unit related to program integrity and fraud investigation activities. A snapshot of this tab of the workbook is provided at the end of this procedure.

8. At the end of each calendar quarter the PI Financial Analyst prepares and forwards to the MFCU, to the attention of the Bureau Chief (Jeremy Ingram as of 05/01/2020) or the Administrative Assistant, a brief report reflecting recoveries made during the quarter just ended. A specially-formatted report in the MFCU A/R database is set up for this purpose.
 - a. In the MFCU A/R Database, Access Reports>>Transactions
 - b. In the design-view, revise the heading to reflect the quarter just ended
 - c. Enter the beginning and ending payment dates at the prompts provided
 - d. Once the report is returned, click on “External Data” and select Excel. Browse to SURS > MFCU > MFCU Quarterly Reports and store the file.
 - e. Save the file with the quarter-end date in the “MM/DD/YY” format.
9. An illustration of this quarter-end report is provided at the end of this procedure.
10. At the end of each month the A/R file is processed using the same steps and in exactly the same format as with the PI A/R file. This MFCU A/R file is created in Excel through a special query, is converted to a CSV (comma separated value) format and is forwarded to the Data Warehouse using the IMPA application. The Sr. Financial Analyst follows the same process as discussed in the procedure, “Accounts Receivable, Uploading PI Data to Data Warehouse”. The MFCU A/R database is set up with the same query options as the PI A/R database.
11. Periodically, other types of settlement checks, such as those obtained in the course of a national global settlement with pharmacy manufacturers or durable-medical-equipment suppliers, are obtained by the MFCU. The federal share of these types of settlements is first paid to the appropriate federal agency prior to sending the checks to the State fraud unit. Therefore, the amount being delivered to the State represents 100% state-only funds.
12. Most national global settlement checks are not attributable to a single Iowa Medicaid provider, but are more often related to a group of providers or an entire provider type. It is therefore not feasible in most cases to associate such checks with a single provider entity.
13. The following steps are completed for those global settlement checks that have been delivered to the MFCU and where the check images have been forwarded to Iowa Medicaid.
 - a. A copy of the check is included in the Folder entitled “Incoming MFCU Recovery Checks” by the Sr. Financial Analyst. Deposit is not made through Iowa Medicaid, but rather the MFCU. The check is then

recorded in a special Excel log spreadsheet, entitled “Log of National Global Settlement Checks”.

- b. In those few cases where a check can be associated with a single Iowa Medicaid provider, the Sr. Financial Analyst records receipt of the check into the MFCU A/R database in the same manner as above. Please refer to the procedure, “Provider Refund Checks, Identifying and Processing”.
- c. The Sr. Financial Analyst makes a special note in the MFCU A/R database that the settlement check represents 100% state funds. These funds are excluded from the federal government pool through the CMS-64 reporting process.
- d. The Sr. Financial Analyst prepares and submits a history-only gross adjustment request for any check that can be associated with a single provider entity. The general procedures for submitting history-only adjustments for all other reasons are followed. Again, there are relatively few national global settlement checks that fit this category.

Forms/Reports:

Month-End A/R Report to Data Warehouse
Quarterly MFCU Recovery Report

Interfaces:

DIA – maintains Intergovernmental Agreement with DHS
MFCU – delivers PDF images of all checks of Medicaid recovered funds to Iowa Medicaid

Attachments:

MFCU Database Record Screen Shot
Pert Track – MFCU Investigations
Recoveries – Qtr End 033120



MFCU Database
Record Screen Shot.



Perf Track - MFCU
Investigations.xlsx



Recoveries-Qtr End
033120.pdf

File Path:

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