

North Sound Mental Health Administration

Regional Support Network for Island, San Juan, Skagit, Snohomish, and Whatcom Counties
Improving the mental health and well being of individuals and families in our communities

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NSMHA Contract Memorandum 2012-004

Date: March 30, 2012

To: Tom Sebastian, Compass Health
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Dean Wight, Whatcom Counseling and Psychiatric Center
Kathy McNaughton, Catholic Community Services Northwest
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Ken Stark, Snohomish County Human Services Director
Phil Smith, Volunteers of America
Cindy Paffumi, Interfaith
Sue Closser, Sunrise Services
Christine Furman, Pioneer Human Services

From: Lisa Grosso, Operations Manager/Compliance Officer

Subject: OIG Heat regarding YouTube Videos

As announced at the March 2012 Quality Management Oversight Committee (QMOC) meeting, NSMHA is writing to provide and endorse the enclosed notice regarding the Office of Inspector General (OIG) Fraud Prevention Initiative, recently distributed to providers by the state Health Care Authority (HCA).

The OIG Health Care Fraud Prevention Enforcement Action Team (HEAT) "YouTube" training videos were reviewed by NSMHA Leadership Team in January vetted through the Planning Committee in February prior to announcement at the March 2012 Quality Management Oversight Committees.

OIG HEAT indicates that there will be additions to these audio/video training resources in the coming months and that these videos are the first installment on what is to be a series. Each provider agency Compliance Officer will continue to update this resource in their Compliance Plan and internal communications with their healthcare professionals and may subscribe to ongoing E-mail updates on the OIG HEAT website at URL link:

<http://oig.hhs.gov/compliance/provider-compliance-training/index.asp>

NSMHA requires that this list of resources be made available by providers to their healthcare professionals and included as a training resource as a part of each provider agency Compliance Plan. Beginning in May 2012, NSMHA audit of provider agencies will include a review of the Compliance Plan for inclusion of this resource and internal communication of this information to their healthcare professionals.

Encl:

- (1) Washington State Health Care Authority, January 2012, Office of Inspector General Fraud Prevention Initiative

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Contract File

January 2012

Office of Inspector General Health Care Fraud Prevention Initiative

Recently, the Office of Inspector General (OIG) of the Department of Health and Human Services (HHS) released short video and audio presentations on top health care compliance topics. These presentations are part of an award-winning Health Care Fraud Prevention and Enforcement Action Team (HEAT) Provider Compliance Training initiative and are designed to assist providers in enhancing their compliance efforts.

The State of Washington Health Care Authority (HCA) is encouraging all Medicaid providers to take advantage of these presentations including the videos, webcasts and to read all presentation materials that are available on the following website: <http://oig.hhs.gov/compliance/provider-compliance-training/index.asp>. Additional videos and audio podcasts will be posted on the OIG website over the next few months. We recommend that providers frequently return to this website to keep up to date on the new OIG-HEAT hot topic presentations.

"These presentations provide an overview of the importance of promoting a culture of prevention, detection, and resolution of compliance problems," said Lewis Morris, Chief Counsel to the Inspector General.

The HCA specifically recommends the following videos and materials:

Exclusion Authorities & Effects of Exclusion

Summary: This video discusses OIG exclusion authorities, which are the legal means by which OIG may bar certain individuals and entities from participating as providers in Federal health care programs, including Medicare and Medicaid. This presentation also includes a discussion of the impact of exclusion on providers and the types of activities and actions that may lead to exclusion.

Video:

[Exclusion Authorities & Effects of Exclusion](#)

Materials related to presentation:

[Understanding Program Exclusions](#)

Navigating the Fraud & Abuse Laws

Summary: These segments of the HEAT Provider Compliance training videos and webcasts discuss information on the different Fraud and Abuse laws. The "Navigating the Fraud and Abuse Laws" webcast give a general overview of the physician self-referral law, anti-kickback Statute, False Claims Act, and

Washington State Health Care Authority

Civil Monetary Penalties Law. The “False Claims Act” and the “Federal Anti-kickback Statute” videos explain in further detail that specific act/statute.

Videos:

[Navigating the Fraud and Abuse Laws](#)

[False Claims Act](#)

[Federal Anti-kickback Statute](#)

Materials related to the presentations:

[Federal Health Care Fraud and Abuse Laws Handout](#)

[Comparison of the Anti-kickback Statute and Stark Law](#)

[Physician Self-Referral Law](#)

[Commonly Used Physician Self-Referral Law Exceptions](#)

[Commonly Used Anti-Kickback Statute Safe Harbors](#)

Operating an Effective Compliance Program

Summary: This recorded video webcast walks through ensuring that your organization’s fundamental elements of a compliance program are effective. This section gives real examples of ways to maintain an effective compliance program. To evaluate your compliance program you should:

1. Review and assess your policies and procedures
2. Develop and evaluate benchmarks and goals with the compliance team and/or board
3. Try out new training options and techniques with employees
4. Have open lines of communication
5. Be proactive in your internal audit reviews
6. Have a plan of enforcement for policies and procedures and prompt response times.

Video:

[Operating an Effective Compliance Program Webcast](#)

Materials related to the presentations:

[Operating an Effective Compliance Program Handout](#)

OIG Subpoenas Audits Surveys and Self Disclosure Protocol

Summary: This webcast discusses two different HEAT topics. The first topic explains ways that OIG requests information from Providers such as subpoenas, audits and surveys. The second topic pertains to how providers can disclosure information to the OIG when they have found a compliance issue within their organization thru self disclosures.

Washington State Health Care Authority

Video:

[OIG Subpoenas Audits, Surveys, and Self Disclosure Protocol](#)

Materials related to the presentations:

[Tips for Success in the OIG Self-Disclosure Protocol](#)

NOTE: The videos are hosted on YouTube.com and are embedded in this message. If YouTube.com is blocked on your computer, any content embedded on our site will not be accessible. Please contact your IT department to remove the YouTube restriction and view these videos.