

DSRIP Compliance



**Leatherstocking
Collaborative
Health Partners**

DSRIP & Compliance

Transformation initiative focused on Medicaid patients
resulting in a union of two oversight agencies

**New York State Department of Health
(NYSDOH)**

&

Office of the Medicaid Inspector General (OMIG)



DSRIP Compliance 101

- The PPS is required to retain a Compliance Officer
- Compliance Officer must be an employee of the Lead Agency
- PPS Lead Agency will flow Medicaid dollars to partners in connection with project implementation and performance
- PPS Lead Agency must dedicate resources toward implementing a compliance program that will assist in preventing and identifying Medicaid payment discrepancies related to DSRIP payments
- PPS Lead Agency must take all reasonable steps to ensure the distribution of said funds are not connected with *waste, fraud or abuse*

DSRIP COMPLIANCE INITIATIVES:

Education & Training

Risk Assessment

Policy & Procedure Development

Quarterly Reporting

LCHP

Compliance Committee Membership

- Ronette Wiley, VP, Performance Improvement & Chief Compliance Officer, Bassett Medical Center
- Aaron Howland, Catholic Charities, Co-Chair
- Lisa Betrus, Valley Health Services
EGB Representative
- Brenda Cobane, Sitrin
- Mary Zielinski, Alpine Rehabilitation and Nursing
- Richella Abel-Hawes, Herkimer ARC
- Robert Vogel, Springbrook

Overview of Compliance Responsibilities

- **Training & Education**
 - Development of a compliance training and education program
 - Proof of training required!
- **Establish a process of reporting compliance issues**
 - Development of anonymous & confidential reporting mechanisms
- **Develop & communicate policies and procedures**
 - Disciplinary policies to encourage “good faith participation” in the compliance program
 - Communication of compliance policies across the PPS
 - Coordination among partners in implementing compliance policies
 - Non-intimidation and non-retaliation policies
- **Development and implementation of system to identify compliance risk among partnership**
- **Response system for compliance issues**
 - Responsible for developing and implementing a system for responding to compliance issues that are raised
 - Develop corrective action plans
 - Develop method for refunding overpayments

Next Steps

- Ensure current compliance structure is appropriate to finalize funds flow process
- Assess educational and training needs throughout PPS
- Refine and communicate policies and procedures relating to PPS-wide compliance
- Develop compliance reporting policy and “hotline”
- Develop system for addressing compliance issues throughout PPS

Questions?

Contact

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