



Child and Adolescent Supplemental Security Income Program (CASSIP) Provisions Required under the Integrated Managed Care System (IMCS) Infrastructure Improvement Services (IIS) Contract

C.1.3.26 Clean Claim: In accordance with 42 C.F.R. § 447.45, a claim that can be processed without obtaining additional information from the Provider of the service or from a third party. It includes a claim with errors originating in the District's claims system. It does not include a claim from a Provider who is under investigation for Fraud or abuse, or a claim under review for Medical Necessity.

C.1.3.200 Waste: The incurring of unnecessary cost as a result of deficient practices, systems, or control.

C.3.2.3.3.12 A Compliance Officer who is responsible for overseeing the Fraud, Waste, and Abuse activities for Contractor, as well as Contractor's risk management activities. The Compliance Officer shall have experience and attend regular trainings in the area of Medicaid Fraud, Waste and Abuse prevention;

C.11.8.3 Fraud, Abuse, and Waste Compliance Program

C.11.8.3.1 In accordance with 42 C.F.R. § 438.608(a), Contractor shall have a Compliance Program that includes administrative and management arrangements or procedures, including a mandatory Compliance Plan, designed to guard against Fraud, Abuse, and Waste.

C.11.8.3.2 Contractor's Compliance Program and Fraud, Abuse, and Waste prevention policies shall comply with 42 C.F.R. § 438.610 and all relevant District and federal laws, regulations, policies, procedures, and guidance (including CMS' Guidelines for Constructing a Compliance Program for Medicaid Managed Care Organizations and Prepaid Health Plans) issued by MAA, HHS, CMS, and the Office of Inspector General, including updates and amendments to these documents.

C.11.8.3.3 Contractor shall include its Fraud, Abuse, and Waste prevention policies in its Provider Manual and a summary in the Enrollee Handbook, including the District's number to call to report suspected Fraud, Abuse, or Waste.

C.11.8.3.4 In accordance with 42 C.F.R. § 438.608(b)(2), Contractor shall designate a Compliance Officer and compliance committee that have the responsibility and authority



for carrying out the provisions of the Compliance Program. These individuals shall be accountable to the Board of Directors and report to the Board of Directors and senior management.

C.11.8.3.5 In accordance with Section C.3.2.3.3.12, Contractor shall designate an officer or director in its organization who has the responsibility and authority for overseeing the Compliance Program. Contractor shall submit to MAA, within one (1) Business Day of the Date of Award, written notice of this person's contact information, and any changes thereto.

C.11.8.3.6 Compliance Plan

C.11.8.3.6.1 As part of its Compliance Program, Contractor shall develop a Compliance Plan. Contractor shall submit the Compliance Plan to the Office of Program Integrity thirty (30) days after the Date of Award. Contractor shall submit any Compliance Plan updates or modifications to the Director of the Office of Program Integrity and the COTR for approval thirty (30) days prior to making them effective. MAA may require that Contractor modify its Compliance Plan at its sole discretion.

C.11.8.3.6.2 At a minimum, the Compliance Plan shall incorporate the following:

C.11.8.3.6.2.1 Written policies, procedures, and standards of conduct that articulate Contractor's commitment to comply with all applicable federal and District standards designed to prevent and detect potential or suspected Fraud, Abuse, and Waste in the administration and delivery of services under the Contract;

C.11.8.3.6.2.2 Effective lines of communication between the Compliance Officer and the Contractor's employees, enforced through well-publicized disciplinary guidelines;

C.11.8.3.6.2.3 Procedures for ongoing monitoring and auditing of Contractor's systems, including but not limited to claims processing, billing and financial operations, enrollment functions, Enrollee services, CQI activities, and Provider activities;

C.11.8.3.6.2.4 Provisions for the confidential reporting of plan violations, such as a hotline to report violations and a clearly designated



individual, such as the Compliance Officer, to receive them. Several independent reporting paths shall be created for the reporting of Fraud, Abuse, and Waste so that such reports cannot be diverted by supervisors or other personnel;

C.11.8.3.6.2.5 Provisions for internal monitoring and auditing reported Fraud, Abuse, and Waste in accordance with 42 C.F.R. § 438.608(b)(4-6);

C.11.8.3.6.2.6 Protections to ensure that no individual who reports plan violations or suspected Fraud, Abuse, and Waste is retaliated against and to protect confidentiality of individuals reporting violations of the Compliance Plan to the extent possible;

C.11.8.3.6.2.7 Provisions for prompt response to detected offenses and for development of corrective action initiatives related to the Contract in accordance with 42 C.F.R. § 438.608(b)(7);

C.11.8.3.6.2.8 Well-publicized disciplinary procedures that shall apply to employees who violate Contractor's Compliance Program; and

C.11.8.3.6.2.9 Training for officers, directors, managers and employees (as described below) to ensure that they know and understand the provisions of Contractor's Compliance Plan.

C.11.8.4 Compliance Training

C.11.8.4.1 In accordance with 42 C.F.R. § 438.608(b)(3), Contractor shall establish a system of effective training and education of the Compliance Officer and the organization's employees and Key Personnel as defined in Section C.3.2.3. Contractor shall conduct or arrange for annual compliance training of all employees, contractors and staff regarding:

C.11.8.4.1.1 Fraud, Waste and Abuse laws, regulations, and policies applicable to CASSIP;

C.11.8.4.1.2 MAA's Fraud, Waste, and Abuse policies and procedures; and

C.11.8.4.1.3 Contractor's Compliance Program and Plan.

C.11.8.5 Whistleblower Protections



Contractor shall ensure that no individual who reports Compliance Plan violations or suspected Fraud, Waste, and Abuse is retaliated against by anyone who is employed by or contracts with Contractor. Anyone who believes that he or she has been retaliated against may report this violation to the Office of Program Integrity and/or the U.S. Office of Inspector General.

C.11.9.7 In accordance with 42 C.F.R. §§ 455.1(a)(1) and 455.17, Contractor shall be responsible for promptly reporting suspected Fraud, Abuse, and Waste information, or the terms of the Contract to the District's Medicaid Fraud Control Unit, MAA's Office of Program Integrity, the Office of Managed Care, and the Contracting Officer within five (5) Business Days of discovery, taking prompt corrective actions and cooperating with MAA in its investigation of the matter(s). Additionally, Contractor shall promptly report to the Office of Program Integrity if it discovers that any of its Providers has been excluded, suspended, or debarred from any District, state, or federal health care benefit program within three (3) Business Days.

C.11.9.7.1 The Fraud, Abuse, and Waste information that shall be reported includes:

C.11.9.7.1.1 The number of reports of Fraud, Abuse and Waste made to the District that require preliminary investigation; and

C.11.9.7.1.2 For each report that warrants investigation, the name and I.D. number of the suspected offender, the source of the appeal, the type of Provider, the nature of the report, the approximate number of dollars involved, and the legal and administrative disposition of the case.

C.11.9.7.1.3 Contractor shall report confirmed and suspected violations to MAA within twenty-four (24) hours of the violation being confirmed.

C.11.9.7.2 Contractor's failure to report potential or suspected Fraud, Abuse, or Waste may result in sanctions and penalties as described in Section G, including but not limited to cancellation of the Contract.