



## DEPARTMENT OF ECONOMIC SECURITY

*Your Partner For A Stronger Arizona*

### DIVISION OF DEVELOPMENTAL DISABILITIES

Sent on Behalf of DES/DDD

## PROGRAM INTEGRITY AUDIT SCHEDULING TO BEGIN OCTOBER 2023

Target Audience - Qualified Vendors and Providers

Transmittal Date - 09/06/2023

In July 2020, the Centers for Medicare and Medicaid Services (CMS) implemented a new initiative to protect taxpayer dollars across the United States called the Medicaid Program Integrity Strategy. This initiative includes the implementation of stronger audits and enhanced oversight functions. These audits are designed to ensure vendors have developed sufficient internal controls to prevent, detect and correct potential fraud, waste and abuse. The Department of Economic Security, Office of Inspector General, Audit Team will begin scheduling qualified vendor audits beginning in October 2023. The audit is designed to identify deficiencies that may require additional support or technical assistance to ensure accurate billing practices.

The scope of the audit includes the review of policies, processes, and procedures related to the vendor's billing system, as well as certifications and trainings. This audit will also include reviewing the Electronic Visit Verification (EVV) process for vendors who deliver EVV services. The audit team will conduct interviews of vendor staff and leadership, and request policies, procedure documentation, and roles and responsibilities of each staff member involved in the billing cycle. The Program Integrity Audits are not post-payment review audits and are limited to the review of policies and procedures. Vendors will be issued a Corrective Action Plan for any material deficiency found and will have six months from the notification date to correct the deficiency.

### **Offshore Performance of Work Prohibited**

Due to security and identity protection concerns, vendors and non-contracted vendors should not access DDD member personal health information (PHI) from outside the United States. This includes use of Focus and Wellsky Claims systems from any IP addresses outside the U.S. Per the Qualified Vendor Agreement 6.3.13, "... and may involve access to or transmission of secure or sensitive data or personal information or development or modification of software for the State shall be performed within the borders of the United States..."

### **No Contact Order Process Change**

The Division issues No Contact Orders for specific individuals that are prohibited from providing direct services to Division members. These notifications are sent via email to the vendors. The Division requires a statement from the vendor confirming it understands the individual is prohibited from providing direct services to all Division members and is not providing direct services to Division members within the **three-business-days date provided in the No Contact Order letter**. The No Contact Order will remain in effect until the investigation by the Division is concluded and the vendor has received formal written notification from the Division lifting the order. Failure to provide a statement may result in referral to the Contract Action Unit, which may include enrollment suspense, payment withholdment, and/or contract suspension.