

OPIOID TREATMENT PROVIDERS: PREPARING FOR AUDITS



The federal Office of Inspector General (OIG) has begun conducting audits of opioid treatment providers (OTPs) on a state by state basis. These audits are designed to verify compliance with federal and state requirements, specifically those associated with Medicaid and federal opioid epidemic funding.

The OIG has already conducted an initial audit in New York and has plans to audit additional states and OTP providers. The audit found that New York claimed federal Medicaid reimbursement for OTP services that did not comply with federal and state requirements. On the basis of the sample results, the OIG estimated that New York improperly claimed at least \$39.3 million in federal Medicaid reimbursement for OTP services during the audit period. Under certain circumstances states may look to providers to fund amounts owed to CMS and/or SAMHSA.

HMA's behavioral health team brings extensive subject matter expertise in state Medicaid policies related to substance use disorder (SUD) service delivery and state and federal provider requirements.

We have a wealth of experience supporting clients related to audit preparation and the development of quality assurance programs. This includes a deep understanding of the unique considerations and rapidly changing regulatory environment for OTP and Office Based Opioid Treatment (OBOT) providers.

STEPS PROVIDERS CAN TAKE TO PREPARE FOR OIG AUDITS:

- » Perform mock chart audits against Medicaid or other funding and regulatory requirements
- » Ensure policies and procedures are established and followed
- » Proactively assess risk for payback

HMA CONSULTANTS ARE AVAILABLE TO ASSIST SUD PROVIDERS BY:

- » Supporting audit preparation, including providing chart audits and mock surveys
- » Developing documentation training for clinical staff
- » Reviewing and updating documents, including policies and procedures, to align with regulatory requirements
- » Helping establish an infrastructure for ongoing quality assurance monitoring and risk avoidance
- » Working with teams to address remediation activities following audits as needed

HMA COLLEAGUES WITH EXPERTISE IN ADDICTION TREATMENT SERVICES INCLUDE:



GINA ECKART, MS LMHC

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- » Licensed mental health counselor with 25 years of experience in public behavioral health
- » Served as director, Division of Mental Health and Addiction, Indiana Family and Social Services Administration
- » Held various clinical and leadership roles at comprehensive urban Community Mental Health Center in Indianapolis
- » Mental health and addiction trainer for the Indiana Law Enforcement Academy and local crisis intervention team



LINDA M. FOLLENWEIDER MS, APRN, BC

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- » Advanced practice registered nurse (APRN) and board-certified family nurse practitioner who has provided care in community and correctional healthcare settings
- » Served as chief operating officer for healthcare services at the Cook County Juvenile Temporary Detention Center and the Cook County Jail
- » Improved care for patients with opioid use disorder including the development of a fully licensed MAT program for detainees as well as a naloxone on release education and provision program



SHANNON ROBINSON, MD

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- » Board certified in psychiatry and addiction medicine and a Fellow of the American Society of Addiction Medicine
- » Former director of the Alcohol and Drug Treatment Program at the San Diego Veterans Administration
- » Served as chief of addiction services for California Correctional Healthcare Services



MARC RICHMAN, PhD

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- » Former deputy director of the Division of Child Mental Health Services, Delaware Division of Medicaid and Medical Assistance
- » Served as assistant Director of Community Mental Health and Addiction Services, Delaware Division of Medicaid and Medical Assistance
- » Previously served as bureau chief, Delaware Department of Corrections Bureau of Healthcare Services



SHELLY VIRVA, LCSW, FNAP

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- » Extensive experience planning, implementing and expanding MAT programs in Federally Qualified Health Centers and Community Health Centers across several states, including both rural and urban settings
- » Developed operational and clinical pathways, protocols and guidelines for MAT in primary care
- » Expertise in addressing addiction for pregnant women and individuals with co-occurring mental health conditions



COREY WALLER MD, MS, FACEP, DFASAM

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- » Nationally recognized addiction expert and an actively practicing addiction, pain, and emergency medicine specialist
- » Chairman of the Legislative Advocacy Committee for the American Society of Addiction Medicine (ASAM)
- » Served as senior medical director for education and policy at the National Center for Complex Health and Social Needs
- » Former medical director of the Spectrum Health Medical Group Center for Integrative Medicine
- » Served as president of the Michigan Society of Addiction Medicine and the substance use disorder medical director at Lakeshore Regional Partners



SCOTT HAGA, MPAS, PA-C

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- » Expertise includes addiction, medication for addiction treatment (MAT) for substance use disorders and building well-functioning, interdisciplinary treatment teams
- » Worked across the criminal justice system to implement MAT in jails and prisons as well as provided evidence-based interventions to reduce incarceration and recidivism
- » Practicing physician assistant, formerly with Spectrum Health Medical Group Center for Integrative Medicine
- » Served as lead physician assistant, providing primary and psychiatric care at a Federally Qualified Health Center in rural Washington



CAITLIN THOMAS-HENKEL, MSW

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- » Expertise in delivery system and payment reform, primary care and behavioral health integration, responses to the opioid epidemic, with a specific focus on effective care management strategies
- » Provided technical assistance to New Jersey Medicaid and Department of Mental Health and Addiction Services in the development of an office-based addiction treatment model while a senior program officer at the Center for Healthcare Strategies
- » Former deputy director of policy, Rhode Island Office of the Senate President
- » Served as director of the Mayor's Substance Abuse Prevention Council, City of Providence

For more information or to speak with an HMA subject matter expert please contact:

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