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

**Additional Information:**

https://oig.hhs.gov/oas/reports/region2/21701021.asp
https://oig.hhs.gov/oas/reports/region9/9180100/R1B.pdf
HMA COLLEAGUES WITH EXPERTISE IN ADDICTION TREATMENT SERVICES INCLUDE:

GINA ECKART, MS LMHC
Managing Principal
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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
Principal
Chicago, IL
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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

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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

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

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