Introduction: The Oregon Health Authority (OHA) is responsible for monitoring compliance with the terms and conditions of the Coordinated Care Organization (CCO) contract and all applicable rules and laws by Exhibit B, Part 9 – Program Integrity. The OHA Office of Program Integrity (OPI) will utilize this review tool to evaluate the following contract deliverables:

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| Deliverable | Contract Citation | Due Date |
| 2025 Quarterly Fraud, Waste and Abuse (FWA) Audit Reports | Ex. B, Part 9, Sec. 18, Para. b (2) | 30 days following the end of each calendar quarter |
| 2025 Annual FWA Audit Report and final PI Audit report(s) | Ex. B, Part 9, Sec. 18, Para. b (1) | January 31 of each Contract Year |
| 2025 Quarterly FWA Referrals and Investigations Reports | Ex. B, Part 9, Sec. 18, Para. c (2) | 30 days following the end of each calendar quarter |
| 2025 Annual FWA Referrals and Investigations Report | Ex. B, Part 9, Sec. 18, Para. c (1) | January 31 of each Contract Year |

The OHA OPI’s evaluation results will be provided to your CCO via the CCO Contract Deliverables [portal](https://oha-cco.powerappsportals.us/). Your CCO’s Contract Administrator, Compliance Officer (CO), and anyone else in your CCO who has a portal account will receive an automated notice when the evaluation results letter and the results themselves are available in the portal (delivery of the letter and results via the portal serves as Administrative Notice as described in the contract). The results letter will indicate whether the deliverable has been approved. If it has not, then the letter will include the deadline for resubmission. You should download the letter and results from the portal; you will not receive them by email.

Review plan: OHA OPI will use ‘compliant’ and ‘non-compliant’ criteria to review compliance with the Quarterly and Annual FWA Audit Reports, Quarterly and Annual FWA Referrals and Investigations Reports, FWA Referral Form, and final Program Integrity (PI) Audit report requirements.

Review process: OHA OPI will use the process in CCO Contract Exhibit D, Section 5 – Correction of Deficient Documents to approve or disapprove your CCO’s deliverables.

**Instructions:** FWA deliverables must be submitted via the CCO Contract Deliverables [portal](https://oha-cco.powerappsportals.us/).Before submitting each FWA deliverable, check that it is complete and the data in each report meet the minimum requirements. See workbooks “Information about this report,” “Line by Line Field Definitions,” and “Instructions” in the FWA Audit Report and FWA Referrals and Investigations Report templates for additional information about the data required within each report and the final PI Audit reports. Upon receipt of OHA’s Administrative Notice via the portal, CCO must remedy each deliverable as directed by OHA.

If you have questions about this document or about OHA’s review process, please contact the OHA OPI at Caleb.Richards@oha.oregon.gov or Allison.m.Tonge@oha.oregon.gov.

*Note*: As a reminder, the following deliverables are reviewed through a separate process involving [Health Services Advisory Group (HSAG)](https://www.hsag.com/en/myoregoneqro/fraud-waste-and-abuse-reviews/): FWA Prevention Handbook, Annual FWA Prevention Plan, and Annual FWA Assessment Report.

Choose an item.

CCO documents submitted for OHA OPI Review

For each FWA deliverable, the CCO must complete the green sections below, adding rows to the table as needed to list all files submitted to OHA OPI for review. Files submitted must be the CCO’s current version.

|  |  |  |  |
| --- | --- | --- | --- |
| **Document Title** | **Document Owner** | **Date** | **Date of Receipt***(for OHA Use only)* |
| ***FWA Audit Report*** | ***CO Name*** | ***XX/XX/XXXX*** |  |
| ***FWA Referrals and Investigations Report*** | ***CO Name*** | ***XX/XX/XXXX*** |  |
| ***Final Program Integrity (PI) Audit report #*** | ***CO Name*** | ***XX/XX/XXXX*** |  |
| ***Final Program Integrity (PI) Audit report #*** | ***CO Name*** | ***XX/XX/XXXX*** |  |

## **CCO’s FWA Annual and Quarterly Audit Reports and Referrals and Investigations Reports**

Using the templates provided by OHA on the CCO Contract Forms [Website](https://www.oregon.gov/oha/HSD/OHP/Pages/CCO-Contract-Forms.aspx), and in accordance with CCO’s FWA Prevention Handbook and Annual FWA Prevention Plan, CCO must provide OHA with quarterly and annual Reports of all PI Audits performed and all cases investigated (2025 CCO Contract Ex. B, Part 9, Sec. 18, Paras. b & c).

* The Annual and Quarterly FWA Audit Report must include all data points listed in the template, information on any provider overpayments that were recovered, the source of the provider overpayment recovery, and any sanctions or corrective actions imposed by CCO on its subcontractors or providers. CCO must report all PI Audits opened, in-process, and closed during the reporting period. CCO must also provide to OHA with each Quarterly FWA Audit Report a copy of the final PI Audit report for each PI Audit identified in the Report as closed during the reporting quarter.
* The Annual and Quarterly FWA Referrals and Investigations Report must include all CCO’s FWA referrals and open and closed preliminary investigations of suspected and credible cases and, regardless of CCO’s own suspicious or lack thereof, any incident with any of the characteristics listed in Sec. 17 of Ex. B, Part 9.

CCO must provide to OHA with each Quarterly FWA Audit Report a copy of the final PI Audit report for each PI Audit identified in the FWA Audit Report as closed during the reporting quarter. A final PI Audit report is a document that meets the report requirements set forth in Ex B Part 9, Sec. 15 (b)(3)(b) and summarizes the PI Audit conducted:

* The information gathered about the provider(s) under Sec. 15 (b)(3)(a)(i), Ex B Part 9
* The date range of the encounter claims audited
* PI Audit focus or question, including the billing code(s) selected for review
* Summary table: Data mining and report on the universe and sample of encounters audited; the clinical or financial records reviewed
* Referrals made by CCO to licensing boards or other state or federal regulatory entities
* Summary of audit criteria applied and the resulting financial and other relevant findings
* Final overpayment
* The outcome of any provider appeal(s), as applicable
* Summary of overpayments recovered, repayment plan, and other provider corrective action(s) or education or both to prevent future overpayments by CCO and the disposition of the PI Audit; and
* Other relevant audit findings as the CCO deems necessary.

In addition to the annual and quarterly summary of FWA Referrals and Investigations, CCO must report (i.e., refer) all suspected cases of FWA including suspected fraud committed by its employees, participating providers, subcontractors, members, or any other third parties to OHA OPI and DOJ’s Medicaid Fraud Control Unit (MFCU) and, regardless of CCO’s own suspicious or lack thereof, any incident with any of the characteristics listed in Sec. 17 of Ex. B, Part 9.

* Reporting (i.e., referrals) must be made promptly but in no event more than seven (7) days after the CCO is initially made aware of the suspicious case.
* All reporting (i.e., referrals) must be made using a FWA Referral Form (form provided by OHA on the CCO Contract Forms [Website](https://www.oregon.gov/oha/HSD/OHP/Pages/CCO-Contract-Forms.aspx)) and as set forth in Paras. h & i of Ex. B, Part 9, Sec. 18 (2025 CCO Contract Ex. B, Part 9, Sec. 18, Para. d).

NOTE: The FWA Audit and FWA Investigation and Referral Reports are not contract deliverables for CCO’s to report routine Third Party Liability (TPL) or Third Party Resource (TPR) recoveries to OHA. CCO compliance with TPL or TPR is monitored by OHA through a separate process. Third Party Liability, Excluding Personal Injury Liens and the process for CCO recovery and reporting are described in Sec. 18 of Ex. B, Part 8. The Personal Injury Liens are described in Sec. 19 of Ex. B, Part 8.

Compliance Review

1. **Reporting Activities:**
2. Number of complaints of suspected FWA referred to the OHA OPI or the MFCU that warrant a preliminary or full investigation; and for each matter that warrants investigation or PI Audit, the following:
	1. Provider name and ID number; or Member name and Member ID number
	2. Source of the complaint
	3. Type of Provider
	4. Nature of the complaint (the billing issue identified, billing code(s) selected for review, or PI Audit focus or question)
	5. Approximate dollars involved (overpayment)
	6. Legal and administrative disposition of the case:
* Outcome(s) of a provider appeal of the audit findings, as applicable
* Overpayment recovery, repayment plan, or other corrective actions imposed by CCO on its subcontractors or participating providers to prevent future overpayments
1. OHA OPI will follow up with CCO on the data within the FWA Audit and FWA Referral and Investigation report(s), as needed. OHA OPI may request additional information from CCO as OHA OPI deems necessary to verify the data is accurate, complete, and meets the requirements of the Contract Ex. B, Part 9.

*NOTE: All data in these reports must be specific to CCO’s Medicaid managed care contract.*

*NOTE: CCO must complete all data fields in the Annual and Quarterly FWA Audit Report and FWA Referrals and Investigations Report templates.*

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| OHA OPI Review: | [ ]  Compliant |
| [ ] Not Compliant |

1. **CCO must use templates provided by OHA**

CCOs must provide copies of completed templates for OHA review of this requirement.

Templates developed by OHA for CCO quarterly and annual FWA Audit and FWA Referrals and Investigations reporting are posted on OHA’s CCO Contract Forms Website: <https://www.oregon.gov/oha/HSD/OHP/Pages/CCO-Contract-Forms.aspx>

1. Template/report is complete and accurate
2. Referrals were made and are accurately reported in the template/report
3. Referrals were made within 7 days, when required by Ex. B, Part 9, Sec. 18
4. All referrals to OHA OPI were sent using the FWA Referral Form *(applicable to referrals sent by CCO or CCO’s subcontractor(s) on or after 1/1/2025)*
5. Each FWA Referral Form has all of the following required information *(applicable to the referrals sent by CCO or CCO’s subcontractor(s) on or after 1/1/2025)*:
6. CCO’s name
7. CCO’s Medicaid contract number
8. Which entity (CCO or subcontractor), and the name and title of the individual within the entity who is performing the investigation, PI Audit, or other review, and their contact information
9. Name of provider or member
10. The suspected issue or allegation
11. The information or data the CCO has already reviewed; and
12. Planned next steps for further investigation.

*NOTE: All data in these reports and the FWA Referral Form must be specific to CCO’s Medicaid managed care contract.*

*NOTE: The template developed by OHA for CCO referrals (FWA Referral Form) is available on OHA’s* [*CCO Contract Forms Website*](https://www.oregon.gov/oha/HSD/OHP/Pages/CCO-Contract-Forms.aspx)*. CCO and subcontractor(s) must send this form directly to OHA OPI and DOJ MFCU (do not use the CCO Contract Deliverables portal).*

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| OHA OPI Review: | [ ]  Compliant |
| [ ] Not Compliant |

1. **CCO PI Audits**
2. CCO must open a PI Audit within twenty (20) business days after CCO receives a written Notice of Potential At-Risk Overpayment from OHA OPI.
	1. A PI Audit was opened and is accurately reported in the template/report
	2. The PI Audit was opened within 20 business days
3. OHA will follow up on the PI Audits listed within CCO’s FWA Audit report(s), as needed, when the PI Audit was opened by CCO as a result of a notification of a potential overpayment by an employee, subcontractor, provider, member, or any other internal or external source.

*NOTE: The Notice of Potential At-Risk Overpayment process is effective, 1/1/2025. This requirement applies to PI Audit(s) opened by a CCO or CCO’s subcontractor(s) on or after 1/1/2025. This* *will be reviewed by OHA OPI for compliance to the extent applicable, not all CCOs may receive a Notice of At-Risk Overpayment from OPI in every contract year.*

*NOTE: PI Audits must be specific to CCO’s Medicaid managed care contract.*

*NOTE: The steps required for a PI Audit are detailed in CCO Contract Sec. 15 (b)(3)(a), of Ex. B Part 9. This requirement applies to PI Audits opened by a CCO or CCO’s subcontractor(s) on or after 1/1/2025.*

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| OHA OPI Review: | [ ]  Compliant |
| [ ] Not Compliant |

1. **CCO final PI Audit reports**

CCO must provide to OHA with each Quarterly FWA Audit Report a copy of the final PI Audit report for each PI Audit identified in the FWA Audit Report as closed during the reporting period.

1. Each PI Audit reported by CCO as closed in the reporting period must have a final PI Audit report.
2. Each final PI Audit report includes the name of the CCO and summarizes the PI Audit performed, specific to CCO’s Medicaid managed care contract with OHA.
3. Each final PI Audit report has all of the following information:
	1. The information gathered about the provider(s) under CCO Contract Ex. B, Part 9, Sec. 15(b)(3)(a)(i)
	2. The date range of the encounter claims audited
	3. PI Audit focus or question, including the billing code(s) selected for review
	4. Summary table: Data mining and report on the universe and sample of encounters audited; the clinical or financial records reviewed
	5. Referrals made by CCO to licensing boards or other state or federal regulatory entities
	6. Summary of audit criteria applied and the resulting financial and other relevant findings
	7. Final overpayment
	8. The outcome of any provider appeal(s), as applicable
	9. Summary of overpayments recovered, repayment plan, and other provider corrective action(s) or education or both to prevent future overpayments performed by CCO and the disposition of the PI Audit; and
	10. Other relevant audit findings as the CCO deems necessary
4. OHA OPI will follow up with CCO on any outstanding final PI Audit reports, as needed.
5. OHA OPI will review each final PI Audit report and may request PI Audit files, encounter data, and other PI Audit supporting documentation in any form, and criteria used for the PI Audit, as deemed necessary by OHA OPI in its sole discretion to determine whether standard audit practices and principles were used in the PI Audit and that the PI Audit complied with all requirements of CCO Contract Ex. B, Part 9.

*NOTE: The requirement in the CCO 2025 Contract for the content of final PI Audit reports is applicable to all copies of final PI Audit reports sent to OHA for PI Audits opened by a CCO or CCO subcontractor(s) on or after 1/1/2025.*

*NOTE: All data in each final PI Audit report must be specific to CCO’s Medicaid managed care contract.*

*NOTE: CCO must provide (and must require all subcontractors to provide) to OHA unredacted copies of final PI Audit reports. Redacted final PI Audit reports do not meet the requirements of the CCO Contract Ex. B, Part 9. OHA has established a process for requesting redacted contract deliverables and reports from CCOs; See CCO Contract Ex. D, Sec. 14.*

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| OHA OPI Review: | [ ]  Compliant |
| [ ] Not Compliant |

1. **CCO PI Audit and investigation records**

OHA OPI may request additional information and documentation from CCO at any time. CCO must respond to a written request from OHA OPI for additional information or encounter data from a PI Audit conducted by CCO or its subcontractor, regardless of whether the records requested are maintained by CCO or maintained separately with one or more of CCO’s subcontractors, and provide copies of the requested information or encounter data, within the timeframes required by CCO Contract Ex. B, Part 9.

1. All requested information or encounter data was sent to OHA OPI
2. The requested information or encounter data was sent by CCO to OHA OPI within 20 business days of the date on OHA OPI’s written request for information (or CCO requested an extension prior to the due date)

*NOTE: CCO must maintain records of all PI Audits and investigations relating to suspected FWA or overpayments. Those records must include the detail necessary to substantiate all actions taken and outcome(s) reached for each PI Audit or investigation.*

*NOTE: The OPI request for information process is effective, 1/1/2025. This requirement applies to written OPI request for information sent to a CCO on or after 1/1/2025. This will be reviewed by OHA OPI for compliance to the extent applicable, not all CCOs may receive a written request for information from OPI in every contract year.*

*NOTE: CCO is solely responsible for responding to requests for information or documentation made by OHA OPI and shall not delegate this responsibility to a subcontractor. OHA OPI will send these requests for information or encounter data to CCO in writing.*

*NOTE: If CCO is unable to submit part or all the requested information to OHA OPI by the response due date, CCO must contact OHA OPI prior to the response due date to discuss the issue(s) and request either an extension and new due date for the unavailable information or other actions, as appropriate. CCO is responsible for submitting all other OHA OPI requested information to OHA OPI by the response due date.*

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| OHA OPI Review: | [ ]  Compliant |
| [ ] Not Compliant |