

Report in Brief

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U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES
OFFICE OF INSPECTOR GENERAL



Why OIG Did This Review

Targeted Case Management (TCM) services assist specific State-designated Medicaid groups in gaining access to medical, social, educational, and other types of services. Previous OIG reviews found that some States did not always claim Federal Medicaid reimbursement for TCM services in accordance with Federal and State requirements.

Our objective was to determine whether Missouri claimed Federal Medicaid reimbursement for TCM services during Federal fiscal years (FYs) 2014 and 2015 in accordance with Federal and State requirements.

How OIG Did This Review

We reviewed documentation for 155 randomly selected TCM paid claims from the developmental disability target group (Missouri's largest target group for TCM services) to determine whether the services provided were allowable, case managers providing services were qualified to do so, and recipients receiving services were eligible. We also reviewed payment rates to determine whether they matched the established fee schedule for the period.

Our review compared TCM claims documentation provided by Missouri to applicable Federal regulations and the State plan supplement governing Missouri's TCM program.

Missouri Claimed Some Unallowable Medicaid Payments for Targeted Case Management Services

What OIG Found

Missouri claimed Federal Medicaid reimbursement of at least \$6 million (almost \$3.8 million Federal share) for unallowable TCM payments during FYs 2014 and 2015. Missouri paid TCM providers and claimed unallowable Federal Medicaid reimbursement because its policies and procedures did not ensure that those providers complied with Federal and State requirements for documenting case managers' qualifications and for documenting and claiming TCM services. In addition, Missouri did not have policies and procedures to ensure that it correctly reported, in its claims for Federal Medicaid reimbursement, TCM paid claims it had recouped from a TCM provider.

Of the 155 randomly sampled TCM claims we reviewed, 21 claims had at least 1 error related to provider qualifications (13 claims), unallowable services (6 claims), unsupported services (2 claims), or TCM paid claims that Missouri had recouped but which it incorrectly accounted for when claiming Federal reimbursement (3 claims). (Some claims had more than one error.)

What OIG Recommends and Missouri Comments

We recommend that Missouri refund the almost \$3.8 million to the Federal Government for unallowable TCM claims. We also make procedural recommendations to Missouri that it strengthen its policies and procedures (1) to ensure that TCM providers maintain documentation of case manager qualifications and to support the TCM services provided and (2) to ensure that Missouri does not pay TCM providers or claim Federal reimbursement for services that are not TCM services and correctly reports recoupment of TCM claims from providers.

Our draft report had identified 23 TCM claims with errors. Missouri disagreed with all but two of the claims that we had found to be unallowable, saying that these were allowable expenditures consistent with Federal and State law and policy. Missouri provided additional documentation with its comments on our draft report.

After reviewing Missouri's comments and the additional documentation, we revised, for this final report, the number of sampled claims in error that we identified, from 23 to 21 claims. Accordingly, we revised our statistical estimate and the dollar amount conveyed in our first recommendation. We maintain that our findings and recommendations, as revised, are valid.