HEALTH CARE INFORMATION MEMO

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Office of Medicaid Inspector General Releases Annual Workplan

On Jan. 29, 2025, the New York State of Office of Medicaid Inspector General released its Annual Workplan, to provide a guide for stakeholders for its 2025 activities. As in past years, the Workplan provides a roadmap for citizens, policymakers, providers, managed care organizations, and other stakeholders to follow as a guide to OMIG's program integrity initiatives planned for 2025.

The Workplan describes six Medicaid Program Integrity Key Focus Areas: Compliance, Self-Disclosure, Home & Community Based Services, Managed Care, Recipient Restriction Program and Pharmacy.

Of particular interest, the Workplan describes continued oversight of the requirements under Social Services Law (SSL) § 363-d and 18 NYCRR Part 521 that providers maintain a Medicaid compliance program. The Workplan indicates that OMIG expects completing approximately 100 compliance program reviews in 2025.

Further, the Workplan continues to emphasize the importance of self-disclosure in the event of overpayment or lost or damaged records. In 2025, OMIG will pursue targeted outreach to providers that have never previously self-disclosed, providing education to smaller provider programs that have a history of lower instances of self-disclosures.

OMIG's Workplan describes its intention to continue Provider Audits across the Medicaid program, including Long-Term Care Services, Home Health & Community-Based Services, Behavioral Health/ Addiction Services and Supports Person-Centered Services and Supports Early Intervention (EI) Health Home Services Pharmacy Transportation Durable Medical Equipment (DME). New in 2025, the Workplan plans audits of Office of Mental Health Personalized Recovery Oriented Services (PROS), Office of Mental Health Telehealth Services, and Office for People With Developmental Disabilities (OPWDD) community habilitation. Providers of these services will want to pay close attention to these new developments.

The issuance of the Workplan is a good reminder to providers to review their current Medicaid compliance program. If you need assistance with your compliance program or in responding to OMIG inquiry or audit, please feel free to contact either Roger Bearden or Gabriel Oberfield, or the attorney with whom you have regular contact. In 2025, Bond, Schoeneck & King will continue its multi-part educational series of Medicaid Compliance Webinars. Please expect registration details for our next engagements in a forthcoming communication.







