Thanks for joining us!

Please sign-in using the chat box:

Example:
Julie Myers, OK, juliemy@health.ok.gov

A national network to share experiences, challenges, and successes with the reinvestment of CMP funds to improve care in nursing homes.
Agenda

Roll Call
Minnesota: CMS Audit of CMP Funds
Networking and Updates
Wrap-up

Materials are online at
CMP.health.ok.gov
Navigate on the left panel to “National CMP Reinvestment Network”

Roll Call by State

• Please have one person from your state or territory respond as each state is called
• All lines will be unmuted during this time

Please sign-in using the chat box:

Example:
Julie Myers, OK, juliemy@health.ok.gov
Civil Monetary Penalty (CMP)
Program Audit
Minnesota

Munna Yasiri
MN Department of Human Services (DHS)

12/06/2017
CMP Program Audit

Background

• Initially began as an audit of Medicaid program financial management records
• Disputed the exclusion of CMP amounts from CMS reporting
• Audit was expanded to look at “reasonableness” (appropriate use) of CMP expenditures

CMP Program Audit

Background

• Covered 3 fiscal years (FFY 13-15)
• Examined all CMP collections during this period of time
• Reviewed all CMP projects funded during that time period
CMP Program Audit

Financial Management Issues

• Tracking CMP deposits
• Separating CMP deposits

 CMP Program Audit

Documentation Issues

• Keep copies of ALL supporting documentation
• Corroborate dates of policies with actions
• Keep copies of source documents for your grantees/contractors AND their subcontractors
**CMP Program Audit**

**Timeframes**

- SFY vs FFY
- Expenditures crossing fiscal years
  - Collections vs Expenditures
  - Varying state and federal policies

**Expenditures**

- State expenditures for administrative costs
- State expenditures for staff costs
- Good or services that are not provided or shipped to the facility address (or a bona fide official location)
- Any personnel costs (facility staff especially, but also contractors, etc.)
CMP Program Audit
Expenditures, cont.

• Double-check invoices and source documents for math errors
• Ensure invoices match project budget amounts
• Lay ground work (in advance) for non-allowable costs
• Watch for costs that are unreasonably high by “normal” standards
• ANY service or items that could be construed as “already covered by State or federal funding” – WATCH THIS ONE!

CMP Program Audit
(allowable State Administrative Costs)

• “reasonable” expenses necessary to administer, monitor, or evaluate the effectiveness of projects – CFR 488.433
  • between 1-3% of fund balance
  • must be approved by CMS in advance
CMP Program Audit Protocols

- the previous work/review/investigation conducted by OIG auditor/s
- OIG auditor works with State program area staff
- in preparation for OIG supervisory review, exit conference and draft report of findings

CMP Program Audit Exit Interview

Opportunity to:
- briefly discuss preliminary findings
- dispute findings (and then quickly gather together additional documentation to support the legitimacy of expenditures and/or deposits)
- view draft report of findings, if ready (otherwise provided shortly thereafter)
CMP Program Audit
Official Findings

- “Expenditures generally allowable,” only a small amount disallowed-

- Identified and disallowed claims for items that “were already supported by other Federal and State funding sources.”

Approximately 20% of CMP collections were spent during the same time period (which CMS found too low)

“As a result, residents and facilities were potentially underserved because of the limited number of services that were approved and supported with CMP collections.”
CMP Program Audit
Lessons Learned

- Document, document, document!
- Obtain CMS RO written approval always and especially when in doubt
- Make good project choices, don’t be too conservative about spending funds

Questions?
Thank you!

For questions or copies of forms, please contact:
Munna Yasiri - Compliance Director
MN Department of Human Services (DHS)
Nursing Facility Rates & Policy (NFRP) Division
(651) 431-2264
munna.yasiri@state.mn.us

Networking and Updates
Questions?
On this or other presentations?

Presenters Wanted:
Is there a State interested in presenting in 2018?

Send us an email or chat box message
CMP@health.ok.gov

Civil Money Penalty
Reinvestment Network

Elevate Care
Our next national network call

Date: March 21, 2018
Time: 2pm CST
Topics:
Emergency Preparedness Planning
Updates from Florida and Texas
Thanks for joining us!
Send questions to CMP@health.ok.gov
Materials are online at CMP.health.ok.gov