

WASATCH BEHAVIORAL HEALTH
SPECIAL SERVICE DISTRICT

MEDICAID OVERPAYMENT REPORTING AND COLLECTIONS – C – 3.18

Purpose:

Wasatch Behavioral Health Special Service District (WBH) establishes the following policy and procedures to report and return identified and quantified overpayments.

Definitions:

Overpayment means any payment made to a Network Provider by a Managed Care Program to which the Network Provider is not entitled to under Title XIX of the Social Security Act or any payment to a Managed Care Program by the Department to which the Managed Care Program is not entitled to under Title XIX of the Social Security Act.

Overpayment Discovery Date means the date the Contractor issues to a Provider a formal notice of recovery of an alleged Overpayment related to Fraud, Waste, or Abuse.

Recovery Period means the period of time the Contractor is allowed to recover any Overpayments related to Fraud, Waste, or Abuse, ending 12 months from the Overpayment Discovery Date, or longer if the Contractor is actively collecting the Overpayment from the Provider.

Policy:

WBH shall exercise reasonable diligence to review potential payment errors. Potential overpayments shall be identified and quantified in a timely manner. Overpayments that have been identified and quantified shall be reported and refunded to the Utah Department of Health “Medicaid” within 60 calendar days after the date on which the overpayment was identified.

Procedures:

1. Providers shall routinely review claims and payments in an effort to ensure that they code correctly and have not received any overpayments
Overpayments include, but are not limited to:
 - Claims paid in error
 - Claims allowed/paid greater than billed
 - Duplicate payments
 - Payments made for individuals who benefit coverage was terminated
 - Payments made for services in excess of applicable benefit limitations
2. When a provider has received an overpayment, the provider shall return the overpayment along with a written explanation for the overpayment, to WBH within 60 calendar days after the date on which the overpayment was identified.
3. When overpayments are associated to fraud, waste or abuse, providers shall follow procedures outline in WBH policy C – 3.13 Fraud, Waste and Abuse.

4. WBH shall submit to the Utah Department of Health “Medicaid” within 60 calendar days of when a provider has identified Capitation Payments or other payments in excess of amounts specified in the providers contract.
5. Quarterly, using the Utah Department of Health “Medicaid” specified format form (Attachment A), WBH shall submit to the Utah Department of Health “Medicaid” a report of overpayments and recoveries.
6. WBH shall submit quarterly reports of Fraud, Waste or abuse related overpayments to the Utah Department of Health “Medicaid” and to the Utah Office of Inspector General (OIG).
7. WBH shall correct Encounter Data related to overpayments (Policy A – 1.06 Accuracy of Data).

Related Policies and procedures

C – 3.13 Fraud, Waste and Abuse

F – 1.07 ABD to Deny Claim Payment Whole or Part

A – 1.06 Accuracy of Data

Right to Change and/or Terminate Policy:

Reasonable efforts shall be made to keep staff members informed of any changes in the policy; however, WBH reserves the right, in its sole discretion, to amend, replace, and/or terminate this policy at any time.

Attachment A Medicaid Reporting Form

Please update form status.

Overpayments

Form Incomplete
 Form Complete
 Nothing to report

Instructions for completing this report template:

- Please report all identified overpayments to the Department.
- Only instances of FWA will need to be reported/referred to the Utah OIG.
- Please list newly identified overpayments during the quarterly reporting period.
- Please update the recovery and status of previously identified overpayments during the quarterly reporting period, as needed.
- Current Overpayment Status: Please select (via dropdown) the status that is appropriate to the identified Overpayment.
 - o Partial Recovery, Contractor Owned means that the Contractor is actively pursuing the Overpayment Collection and has recovered a portion of the Overpayment.
 - o No Recovery, Contractor Owned means the Contractor has identified an overpayment and has no recoveries as of the reporting period.
 - o Full Recovery Collected by the Contractor means the Contractor has fully recovered the overpayment as of the reporting period.
 - o Partial Recovery, Referred to Utah OIG means the Contractor has partially recovered the overpayment and has referred any remaining balance to the Utah OIG for collection.
 - o No Recovery, Referred to Utah OIG means the Contractor has referred the full overpayment to the Utah OIG for collection.
- Recovered In the Quarter: Report all recoveries during the quarter.
- Total Recovered to Date: Report the total recoveries to date (i.e. the total of all quarters to date)
- Encounter Adjustment: Regardless of recovery or referral to the OIG, Encounters must be adjusted for all identified overpayments, per Article 12.4.1 Procedures for Incorrectly Paid Claims, of Attachment B, Special Provisions.

Reports are due on the following dates for the corresponding time periods:

- February 1st (October – December)
- May 1st (January – March)
- August 1st (April – June)

Provider NPI	Provider Name	Discovery Date	Amount of Overpayment	Related to FWA (Y/N)	Current Overpayment Status	Amount Recovered in the Quarter	Total Recovered To Date	Encounter Adjusted with Replace or Void (R or V)	Encounter Adjustment Date	Encounter Adjusted Claim ID	Brief Explanation of Overpayment
1234567891	Jane Doe	1/10/2020	535.2	Y	Partial Recovery, Contractor Owned	0	100	R	2/10/2020	xxxxxxxxxx	Waste.....
1234567891	Jane Doe	2/15/2020	1,021.11	Y	Full Recovery Collected by Contractor	500	1021.11	V	4/10/2020	xxxxxxxxxx	Waste.....
1234567891	Jane Doe	3/2/2020	13,510.10	Y	No Recovery, Contractor Owned	0	0	R	4/10/2020	xxxxxxxxxx	Fraud.....
1234567891	Jane Doe	4/25/2020	400.13	Y	Full Recovery Collected by Contractor	400.13	400.13	V	5/30/2020	xxxxxxxxxx	Fraud.....
1234567891	Jane Doe	5/15/2020	10,215	Y	Partial Recovery, Referred to Utah OIG	1000	1,000	V	7/1/2020	xxxxxxxxxx	Fraud.....
1234567891	Jane Doe	6/10/2020	12,105	Y	No Recovery, Referred to Utah OIG	0	0	V	7/1/2020	xxxxxxxxxx	Fraud.....