



<b>Title:</b> OMIG Self Disclosure Policy	<b>Created by:</b> Jennifer Cathy, President, and CEO
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### Purpose

This policy outlines the process for identifying, reporting, and addressing Medicaid overpayments in compliance with the New York State Office of the Medicaid Inspector General (OMIG) Self-Disclosure Program. It defines the roles and responsibilities of staff required to report overpayments and establishes procedures for submitting self-disclosures to OMIG.

### Scope

This policy applies to all staff involved in Medicaid billing, finance, and compliance functions, including:

- Billing Department
- Finance Director
- Compliance Officer (if applicable)

### Policy Statement

Medicaid providers are required to report, return, and explain any identified overpayments to OMIG within 60 days of identification or by the due date of any corresponding cost report, whichever is later. Voiding or adjusting claims does not satisfy the obligation to report overpayments.

Failure to disclose overpayments can result in penalties, including fines up to \$10,000 per violation.

### Role and Responsibilities

#### 1. Staff Required to Report Overpayments

Any employee who identifies a potential overpayment must report it immediately to the Billing Department. This includes:

- Billing Specialists
- Program Managers
- Finance Staff
- Any staff who handle Medicaid claims or compliance reviews

#### 2. Responsibilities of the Billing Department

The Billing Department is responsible for:

- Conducting an initial review of the identified overpayment.
- Determining whether the overpayment is due to:
  - Routine billing errors (e.g., typographical mistakes)
  - Systemic issues requiring corrective action
  - Potential fraud, waste, or abuse
- Categorizing the disclosure as either:



- Full Self-Disclosure (e.g., fraud, system issues, non-claim-based overpayments)
  - Abbreviated Self-Disclosure (e.g., routine billing errors, typographical mistakes)
- Compiling necessary documentation, including:
  - Claims Data File
  - Mixed Payer Calculation (if applicable)
  - Corrective action plans (for systemic issues)
- Forwarding the findings and supporting documentation to the Finance Director within 10 business days.

### 3. Responsibilities of the Finance Director

The Finance Director is responsible for:

- Reviewing the Billing Department's findings.
- Ensuring all necessary documentation is included.
- Submitting the self-disclosure to OMIG within the required 60-day timeframe.
- Communicating with OMIG regarding any additional information requests.
- Ensuring repayments are processed through voids, adjustments, or lump sum payments.
- Maintaining a record of all self-disclosures and corrective actions for compliance tracking.

## Procedure for Self-Disclosure Reporting

### 1. Identifying and Reporting an Overpayment

- Discovery: Any staff member who identifies an overpayment must report it to the Billing Department immediately.
- Initial Review: The Billing Department reviews and categorizes the overpayment.
- Documentation Preparation: The Billing Department gathers all required information and sends it to the Finance Director.

### 2. Submission to OMIG

- The Finance Director submits the disclosure through OMIG's secure online portal:
  - **Full Self-Disclosure**: [OMIG Full Self-Disclosure Submission](#)
  - **Abbreviated Self-Disclosure**: [OMIG Abbreviated Self-Disclosure Submission](#)
- Timeframe: The submission must occur within 60 days of overpayment identification.
- Confirmation: OMIG will send an acknowledgment email with a unique case identifier.

## Record-Keeping and Compliance

- All self-disclosures and corrective actions must be documented and stored for six years.
- The Finance Director and Billing Department must conduct periodic internal audits to ensure compliance with self-disclosure obligations.
- Any failure to comply with this policy will be subject to disciplinary action.



## References

- OMIG Self-Disclosure Program: [OMIG Website](#)
- New York State Social Services Law § 363-d
- 18 NYCRR SubPart 521-3