

# May 2024 OIG Work Plan Updates



**CJ Wolf** MD, CHC, CPC, CCEP, CIA

New updates to OIG's Work Plan over the last month span a wide range of subjects and areas of focus – let's take a look at some key additions.



## NATIONWIDE AUDIT OF ORGAN PROCUREMENT ORGANIZATIONS

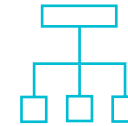
When a patient in the United States needs an organ transplant, they typically are placed on a waiting list to receive a particular organ. There are not-for-profit organizations that coordinate the procurement, preservation, and transportation of organs to hospitals where patients await transplant surgery. These organizations are called Organ Procurement Organizations, or OPOs. Transplant hospitals have components within the hospital called Certified Transplant Centers, or CTCs. The CTCs provide the transplantation of organs for patients.

Medicare reimburses CTCs for certain costs associated with the procurement of organs from OPOs or other CTCs when Medicare patients are receiving an organ transplant. There are federal regulations surrounding

these activities of organ procurement and transplantation.

**Prior OIG work** found that payments were made to OPOs that did not meet Medicare requirements. Specifically, OIG concluded that an estimated \$664,295 paid for professional and public education overhead costs was unallowable. They stated the OPOs failed because they misunderstood Medicare requirements and their staff made administrative errors or were not aware that costs did not meet Medicare requirements.

Consequently, this newly added OIG Work Plan item describes OIG's intention to determine whether costs reported by OPOs and CTCs were allowable, reasonable, and according to Medicare requirements, and whether OPOs met required process performance and outcome measures.



## GEOSPATIAL DATA ACT

In 2018 the Geospatial Data Act was signed into law. The intent of the law is to promote the efficient management of geospatial data, technologies, and infrastructure as a result of improved collaboration among Federal, State, local, and Tribal Governments, the private sector, and academia.

OIG is required to perform an audit of the Department of Health and Human Services' progress toward compliance with the Geospatial Data Act.





### AUDIT OF THE OFFICE OF NATIONAL DRUG CONTROL POLICY

Drug overdose deaths are still a major concern in the United States. The Office of National Drug Control Policy is tasked with leading the country's drug policy efforts to improve the health of lives of all Americans. This office oversees a \$41 billion budget as it coordinates the efforts across 19 federal agencies.

In 2023, federal agencies reported data to the Office of National Drug Control Policy related to reducing overdose deaths but some of the related performance measures did not have accompanying data that was conclusive.

With this audit, the OIG plans to review the Centers for Disease Control and Prevention and the Substance Abuse and Mental Health Services Administration performance measures and targets to determine how they were developed and reported and whether the agencies encountered challenges implementing them.

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Data Act.



### PUERTO RICO MEDICAID

In Puerto Rico, the Medicaid program is entirely managed care and there are more than one million people enrolled in the program. In 2022, the U.S. Congress provided Puerto Rico with additional funds for the Medicaid program until the year 2027.

The OIG is tasked with determining whether Puerto Rico has complied with applicable provisions of the additional funding and whether they designed, implemented, and effectively operated an internal controls system for Medicaid contracts in compliance with Federal requirements.



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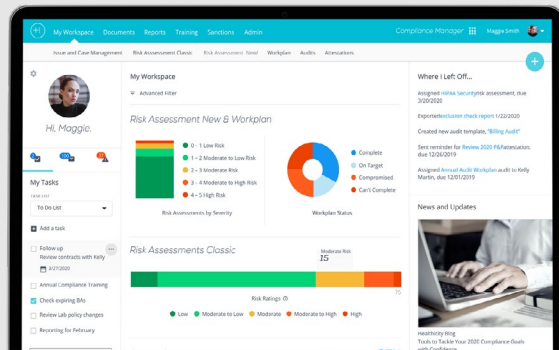
CJ Wolf is a healthcare professional with more than 20 years of experience in hospital and physician revenue cycle, practice management, compliance, coding, billing, and client services. He has provided healthcare consulting and solution services to hospitals and physician organizations throughout the country.





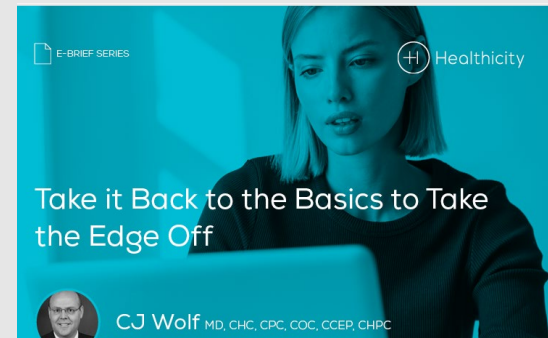
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