



FISCAL AND OPERATIONS DIVISION
Program Integrity Audit Unit

Tina Kotek, Governor

Oregon
Health
Authority

March 23rd, 2023

Lori L. Landolt, MBA, CPMA, CDC
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone: 503-890-6820
FAX: 503-378-2577
Email: lori.l.landolt@oha.oregon.gov

Via Certified Mail: «Tracking_Number»

RE: Preliminary Audit Report; Provider

Dear

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

The preliminary audit of paid claims with a payment date of April 30th, 2019, through April 30th, 2021, is complete. Based upon the documentation submitted, the preliminary error rate for stratum 1-3 is 100% and the potential overpayment is \$128,457.25.

Action requested: Please respond by April 20th, 2023.

Please review the enclosed Preliminary Audit Report and Matrix of Findings. For each finding in the matrix, indicate whether you agree or disagree, and return your comments by April 20th, 2023. If you disagree with a finding, please send the following information:

- A statement clearly explaining the reason(s) and evidence for your disagreement; and
- Any additional documentation that supports the services or items billed.

PIAU will review any additional documentation submitted, prepare the final audit report, and notify you of any financial impact. Additional documentation will not be accepted once the final audit report is issued.

If you have any questions, please contact me directly at 503-890-6820.

Thank you for your cooperation in this process.

Sincerely,

Lori Landolt, MBA, CPMA, CDC

Lori L. Landolt, MBA, CPMA, CDC
Program Integrity Auditor
Program Integrity Audit Unit

Enclosure: Preliminary Audit Report



FISCAL AND OPERATIONS DIVISION
Program Integrity Audit Unit

Tina Kotek, Governor



Lori L. Landolt, MBA, CMPA, CDC
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone: 503-890-6820
FAX: 503-378-2577
Email: lori.l.landolt@oha.oregon.gov

June 8th, 2023

Via Secure E-Mail:

RE: Final Audit Report; Provider

Dear :

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

The final audit of paid claims with a payment date of April 30th, 2019, through April 30th, 2021, is complete. Based upon the documentation submitted, the final error rate for stratum 1-3 is 100% the total overpayment is \$128,457.25.

Reimbursement of the overpayment is due and payable by July 7th, 2023. Please remit payment and include a copy of the invoice to the address below.

DEPARTMENT OF HUMAN SERVICES
AR & RECEIPTING UNITS, OFS
RSTARS RECEIVABLES
P O BOX 4325
PORTLAND, OR 97208-9992

If you disagree with the audit findings, you may request an appeal within 30 calendar days as outlined in the final audit report. If you choose to appeal the audit, PIAU may first schedule an informal conference to provide an opportunity to settle areas of disagreement. Any remaining unresolved issues may then be addressed in a formal administrative review or contested case hearing.

If you have any questions, please contact me directly at 503-890-6820.

Thank you for your cooperation in this process.

Sincerely,

Lori Landolt, MBA, CPMA, CDC

Lori L. Landolt, MBA, CPMA, CDC
Program Integrity Auditor
Program Integrity Audit Unit

Enclosure: Final Audit Report



July 18, 2023

Mr. Fritz Jenkins
Administrator
OHA Program Integrity
500 Summer Street NE-E20
Salem, Oregon 97301

RE:

Dear Mr. Jenkins:

As I have stated in my earlier letter of July 6, 2023, I represent _____ in connection with the above-captioned matter. Since I have no other address to which to send this letter, I am sending it to the only address provided by your department. If there is another address, please let me know.

My client requests a hearing concerning the audit findings in this matter pursuant to ORS Chapter 183, OAR 410-120-1398(12)(a)(B) and OAR 410-120-1396(11)(c).

The reasons for requesting an audit are as follows:

1. The sample size used in the Final Audit dated June 8, 2023 is not a sample size determined in accordance with proper statistical analysis as set forth below;
2. Samples 1-8 are for dates of service that are prior to April 30, 2019; and
3. The Final Audit states that 13 claims for Stratum 1 were sampled but the matrix shows 14 claims thus not lending itself to faith in the numbers.

DETAILED ISSUES

While a computer report such as the one run here on the Calvin analysis* may produce statistics, statistics are often wrong and cannot be relied upon unless confirmed in accordance with mathematical analysis. The formula for computing the n is:

$(z\text{-score})^2 \times p \times (1-p) / (\text{margin of error})^2$

Such is the case here where the sample size for all of the strata is not sufficient to produce an extrapolated number in which one would have any confidence. In our calculations, a sample size of 385 for a population of 1639 (the number for all of the strata) would be appropriate. This is confirmed by our use of the above formula and CHAT GPT using the query "What is the proper sample size for a population of 1639 using 95% as a confidence level."

Furthermore, the vast majority of the challenged claims relate to services performed in 2018 up to April 30, 2019. What the audit is saying, once extrapolation is applied, is that the miniscule number of samples chosen (43/44) allows one with a 95% confidence to state that everything from 2019-2021 is tainted. Such certainly cannot be the case.

We look forward to having a discussion with you about the resolution of this matter.

Thanking you in advance for your attention, I remain

Sincerely,

*Please note that the Calvin analysis is from the 1990's. The work of Dr. Calvin appears to have been mainly in the area of biology at Oregon State University. I have a background in biology and genetics and I know that a different analysis is performed for business statistics. Could you please send me the detail of how this analysis is performed?

CC:
Program Integrity Auditor
Program Integrity Audit Unit



April 27, 2023

Debbie Bruns
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone: 503-890-5563
FAX: 503-378-2577

Email: Debbie.k.bruns@dhsosha.state.or.us

Via Secure E-Mail.

RE: Amended Final Audit Report; Provider :

Dear

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

After discussion with Administrative Management, findings were removed while others were given partial credit for the difference between codes billed.

The amended final audit documents for the period of 1/1/2019 through 06/30/2020 is complete. Based upon the documentation submitted, the final error rate for strata 1 through 3 is 67% and the total overpayment is **\$115,808.22**.

Reimbursement of the overpayment is due and payable by **May 27, 2023**. Please remit payment and include a copy of the invoice to the address below.

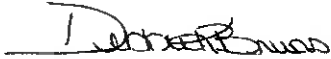
DEPARTMENT OF HUMAN SERVICES
AR & RECEIPTING UNITS, OFS
RSTARS RECEIVABLES
P O BOX 4325
PORTLAND, OR 97208-9992

If you disagree with the audit findings, you may request an appeal within 30 calendar days as outlined in the final audit report. If you choose to appeal the audit, PIAU may first schedule an informal conference to provide an opportunity to settle areas of disagreement. Any remaining unresolved issues may then be addressed in a formal administrative review or contested case hearing.

If you have any questions, please contact me directly at 503-890-5563.

Thank you for your cooperation in this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Debbie K. Bruns". The signature is written in a cursive style with a horizontal line underneath.

Debbie K Bruns, CPMA
Program Integrity Auditor, Lead
Program Integrity Audit Unit

Enclosure: Amended Final Audit Report, Amended Final Matrix, and Invoice



April 27, 2023

Debbie Bruns
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone: 503-890-5563
FAX: 503-378-2577
Email: Debbie.k.bruns@dhsosha.state.or.us

Via Secure E-Mail.

RE: Amended Final Audit Report; Provider

Dear .

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

After discussion with Administrative Management, findings were removed while others were given partial credit for the difference between codes billed.

The amended final audit documents for the period of 1/1/2019 through 06/30/2020 is complete. Based upon the documentation submitted, the final error rate for strata 1 through 3 is 67% and the total overpayment is **\$115,808.22**.

Reimbursement of the overpayment is due and payable by **May 27, 2023**. Please remit payment and include a copy of the invoice to the address below.

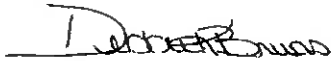
DEPARTMENT OF HUMAN SERVICES
AR & RECEIPTING UNITS, OFS
RSTARS RECEIVABLES
P O BOX 4325
PORTLAND, OR 97208-9992

If you disagree with the audit findings, you may request an appeal within 30 calendar days as outlined in the final audit report. If you choose to appeal the audit, PIAU may first schedule an informal conference to provide an opportunity to settle areas of disagreement. Any remaining unresolved issues may then be addressed in a formal administrative review or contested case hearing.

If you have any questions, please contact me directly at 503-890-5563.

Thank you for your cooperation in this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Debbie K Bruns", written over a horizontal line.

Debbie K Bruns, CPMA
Program Integrity Auditor, Lead
Program Integrity Audit Unit

Enclosure: Amended Final Audit Report, Amended Final Matrix, and Invoice



February 15, 2023

Debbie Bruns
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone: 503-890-5563
FAX: 503-378-2577

Email: Debbie.k.bruns@dhsosha.state.or.us

Via Secure E-Mail:

RE: Final Audit Report; Provider

Dear _____ :

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

The final audit of paid claims with a payment date of 1/1/2019 through 6/30/2020 is complete. Based upon the documentation submitted, the final error rate for strata 1 through 3 is 80% and the total overpayment is **\$163,240.60**.

Reimbursement of the overpayment is due and payable by **March 15, 2023**. Please remit payment and include a copy of the invoice to the address below.

DEPARTMENT OF HUMAN SERVICES
AR & RECEIPTING UNITS, OFS
RSTARS RECEIVABLES
P O BOX 4325
PORTLAND, OR 97208-9992

If you disagree with the audit findings, you may request an appeal within 30 calendar days as outlined in the final audit report. If you choose to appeal the audit, PIAU may first schedule an informal conference to provide an opportunity to settle areas of disagreement. Any remaining unresolved issues may then be addressed in a formal administrative review or contested case hearing.

If you have any questions, please contact me directly at 503-890-5563.

Thank you for your cooperation in this process.

Sincerely,

Debbie K Bruns, CPMA
Program Integrity Auditor, Lead
Program Integrity Audit Unit

Enclosure: Final Audit Report, Final Matrix, and Invoice



December 13, 2022

Debbie K Bruns, CPMA
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone: 503-890-5563
FAX: 503-378-2577

Email: Debbie.K.Bruns@dhsosha.state.or.us

Via Certified Mail.

RE: Preliminary Audit Report;

Dear _____

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

The preliminary audit of paid claims with a payment date of 1/1/2019 through 6/30/2020 is complete. Based upon the documentation submitted, the preliminary error rate for strata 1 through 3 is 90% and the combined potential overpayment is \$177,084.37.

Action requested: Please respond by 1/13/2023.

Please review the enclosed Preliminary Audit Report and Matrix of Findings. For each finding in the matrix, indicate whether you agree or disagree, and return your comments by 1/13/2023. If you disagree with a finding, please send the following information:

- A statement clearly explaining the reason(s) and evidence for your disagreement; and
- Any additional documentation that supports the services or items billed.

PIAU will review any additional documentation submitted, prepare the final audit report, and notify you of any financial impact. Additional documentation will not be accepted once the final audit report is issued.

If you have any questions, please contact me directly at 503-890-5563.

Thank you for your cooperation in this process.

Sincerely,

Debbie K Bruns, CPMA
Program Integrity Auditor
Program Integrity Audit Unit

Enclosure: Preliminary Audit Report



August 24, 2023

Eugenia Gilkey
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone: 503-580-5562
FAX: 503-378-2577
Email: eugenia.gilkey@oha.oregon.gov

Via Secure E-mail

RE: Final Audit Report; Provider

Dear

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

PIAU has completed the final audit of Addiction Counseling for paid claims with a payment date of 01/01/2019 through 06/30/2020.

In accordance with Oregon Administrative Rule (OAR) 410-120-1396(20) reimbursement of the overpayment is due and must be paid within 30 calendar days from the postmark date or email sent date of the final audit report. Overpayment is due by 09/25/2023. If payment is not received, PIAU may take one or more of the actions described in OAR 410-120-1396(20)(b), including recouping the overpayment from future payments.

Please coordinate payment by contacting the Program Integrity Recoupment Analyst:

Sheila Halvorson
Office of Program Integrity
Oregon Health Authority
3406 Cherry Avenue NE, Salem, OR 97303
Phone #: (503) 890-4813, Fax: (503) 378-2577
Email: OPI.Recoupment@oha.oregon.gov

If Addiction Counseling disagrees with specific audit findings, a request for an appeal may be submitted within 30 calendar days as outlined in the enclosed final audit report. If chooses to appeal the audit, PIAU may first schedule a preliminary meeting to provide an opportunity to settle areas of disagreement. Any remaining unresolved issues may then be addressed in a formal administrative review or contested case hearing.

If you have any questions, please contact me directly at 503.580.5562.

Thank you for your cooperation in this process.

Eugenia Gilkey
Government Auditor
Program Integrity Audit Unit

Enclosure: Final Audit Report



FISCAL AND OPERATIONS DIVISION
Program Integrity Audit Unit

Tina Kotek, Governor



April 7, 2023

Eugenia Gilkey
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone: 503-580-5562
FAX: 503-378-2577

Attn:

Email: eugenia.gilkey@oha.oregon.gov

Eugene, OR 97401

Via Secure E-Mail:

RE: Preliminary Audit Report; Provide

Dear

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

The preliminary audit of paid claims with a payment date of 01/01/2019 through 06/30/2020 is complete. Based upon the documentation submitted, the preliminary error rate for stratum 1 is 65% and potential overpayment is \$831.23. The preliminary error rate for stratum 2 is 57% and the potential extrapolated overpayment is \$8,476.01. The preliminary error rate for stratum 3 is 26% and the potential overpayment is \$730.57. Total potential overpayment amount is \$10,037.81.

Action requested: Please respond by May 8, 2023.

Please review the enclosed Preliminary Audit Report and Matrix of Findings. For each finding in the matrix, indicate whether you agree or disagree, and return your comments by 05/08/2023. If you disagree with a finding, please send the following information:

- A statement clearly explaining the reason(s) and evidence for your disagreement; and
- Any additional documentation that supports the services or items billed.

PIAU will review any additional documentation submitted, prepare the final audit report, and notify you of any financial impact. Additional documentation will not be accepted once the final audit report is issued.

If you have any questions, please contact me directly at 503-580-5562.

Thank you for your cooperation in this process.

Sincerely,

Eugenia Gilkey
Government Auditor
Program Integrity Audit Unit

Enclosure: Preliminary Audit Report



FISCAL AND OPERATIONS DIVISION
Office of Program Integrity

Tina Kotek, Governor



January 24, 2023

Nancy Wood, CPC, CPMA
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone: 503-890-4102
FAX: 503-378-2577

Email: nancy.a.wood@dhsosha.state.or.us

Via Secure Email:

RE: Final Audit Report; Provider

Dear Provider:

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

The final audit of paid claims with a payment date of 1/1/2018 through 12/31/2019 is complete. Based upon the documentation submitted, the final error rate for stratum 1 is zero and the final error rate for stratum 2 is 33% and the total overpayment is \$288.82.

Reimbursement of the overpayment is due and payable by February 27, 2023. Please remit payment and include a copy of the invoice to the address below.

DEPARTMENT OF HUMAN SERVICES
AR & RECEIPTING UNITS, OFS
RSTARS RECEIVABLES
P O BOX 4325
PORTLAND, OR 97208-9992

If you disagree with the audit findings, you may request an appeal within 30 calendar days as outlined in the final audit report. If you choose to appeal the audit, PIAU may first schedule an informal conference to provide an opportunity to settle areas of disagreement. Any remaining unresolved issues may then be addressed in a formal administrative review or contested case hearing.

If you have any questions, please contact me directly at 503-890-4102.

Thank you for your cooperation in this process.

Sincerely,

Nancy Wood
Program Integrity Auditor
Program Integrity Audit Unit

Enclosure: Final Audit Report



FISCAL AND OPERATIONS DIVISION
Program Integrity Audit Unit

Kate Brown, Governor



Lauren Kissinger, CPC, CPMA
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone # 503-378-3584
FAX: 503-378-2577

E-mail: Lauren.N.Kissinger@dhsosha.state.or.us

November 10, 2020

Portland, OR 97202-3772

Via Certified Mail.

RE: Preliminary Audit Report: Provider

Dear _____ :

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

The preliminary audit for the time period of July 1, 2017 through June 30, 2018 is complete. Based upon the documentation submitted, the potential overpayment is \$1,016,819.64.

Action requested: Please respond by December 11, 2020.

Please review the enclosed Preliminary Audit Report and Matrix of Findings. For each finding in the matrix, indicate whether you agree or disagree, and return your comments by December 11, 2020. If you disagree with a finding, please send the following information:

- A statement clearly explaining the reason(s) and evidence for your disagreement; and
- Any additional documentation that supports the services or items billed.

PIAU will review any additional documentation submitted, prepare the final audit report, and notify you of any financial impact. Additional documentation will not be accepted once the final audit report is issued.

If you have any questions, please contact me directly at 503-378-3584.

Thank you for your cooperation in this process.

Sincerely,

Lauren Kissinger, CPC, CPMA
Program Integrity Auditor
Program Integrity Audit Unit

Enclosure: Preliminary Audit Report



FISCAL AND OPERATIONS DIVISION
Program Integrity Audit Unit

Kate Brown, Governor

Oregon
Health
Authority

May 18, 2021

Lauren Kissinger
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone # 503-890-5220
FAX: 503-378-2577

E-mail: Lauren.N.Kissinger@dhsosha.state.or.us

Portland, OR 97202-3772

Via Certified Mail.

RE: Final Audit Report; Provider #

Dear Mr.

The Centers for Medicare & Medicaid Services requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

The final audit for the time period of July 1, 2017 through June 30, 2018 is complete. Based upon the documentation submitted, the total overpayment is \$822,807.47.

Reimbursement of the overpayment is due and payable by June 18, 2021. Please remit payment in the enclosed envelope and include a copy of the invoice to the address below.

DEPARTMENT OF HUMAN SERVICES
AR & RECEIPTING UNITS, OFS
RSTARS RECEIVABLES
P O BOX 4325
PORTLAND, OR 97208-9992

If you disagree with the audit findings, you may request an appeal within 30 calendar days as outlined in the final audit report. If you choose to appeal the audit, PIAU may first schedule an informal conference to provide an opportunity to settle areas of disagreement. Any remaining unresolved issues may then be addressed in a formal administrative review or contested case hearing.

If you have any questions, please contact me directly at 503-890-5220.

Thank you for your cooperation in this process.

Sincerely,

Lauren Kissinger, CPC, CPMA
Program Integrity Auditor
Program Integrity Audit Unit

Enclosure: Final Audit Report, Accounts Receivable Invoice

June 1, 2021

Fritz Jenkins, Administrator
OHA Program Integrity
500 Summer Street NE-E20
Salem, Oregon 97301

RE: APPEAL OF OVERPAYMENT ASSESSMENT

A/R#:

Sfx #:

Provider:

Dear Mr. Jenkins:

_____ hereby requests an administrative review pursuant to ORS Chapter 183 with respect to the Provider Audit, October 1, 2016 – September 30, 2018, Provider Number _____

In addition, _____ requests that OHA schedule a preliminary meeting to settle areas of disagreement.

The specific areas of disagreement are based on the following three recurring findings in the audit:

1. No DSS signature.
2. Attestations do not describe specific services or extent of services provided.
3. Attestations do not indicate service start or end times.

These three findings are data-based, not service-based. The data were lost, as attested in the audit response, due to a database transition required by the Company's franchisor. This loss does not represent a failure to provide actual service or actual timekeeping. _____ provided attestation to the fact of actual timekeeping in the form of start and end times reviewed weekly by two different agency employees as part of the payroll and billing processes of the company. The Company also attested to service documentation that was reviewed by program admins. We are working on further attestations with staff to clarify these areas to the best of our ability. For 44 findings of the same nature reported in the original findings, where paper documentation was available, all 44 findings were reduced or removed.

_____ can verify that the services in question were provided. The Company simply does not have data in the form the audit requires. If the Office of Program Integrity will not under any circumstances accept our verification, _____ must close the business down, layoff the employees and terminate services to its clients.

SUMMARY:

The crux of the issue is that due to a change in its scheduling and database administration provider, which change was mandated by [redacted]’ franchisor, the Company lost access to the data necessary to fully respond to the audit in the form required by the Auditor. [redacted] proceeded in good faith to assemble a response to the audit to attest that the services were provided for which reimbursement was received. Now, following receipt of the Final Audit Report and discussions with the Office of Program Integrity Auditor, Lauren Kissinger, [redacted] has done additional work to further document services provided in a manner that will hopefully be satisfactory to the Office of Program Integrity. The question now is whether this documentation will be acceptable for purposes of the audit.

We believe the major factor is that there is no fraud. [redacted] did provide the services for which it was paid by the State and, in turn, the Company compensated the direct support specialists (DSSs) who filled the shifts with the clients. The issue is that due to loss of the data, [redacted] was not able to provide the specific documentation the audit called for. And the attestations [redacted] provided, which honestly attest that the service was provided, have been largely disregarded by Office of Program Integrity.

The Office of Program Integrity issued an order requiring [redacted] to repay what is calculated as an overpayment in the amount of \$822,807.47. That amount is calculated based not on a finding of fraudulent billings for services, but rather on [redacted] failure to provide data in a specific form that fully complies with the audit’s reporting requirement.

The effect of the order is to require [redacted] to provide – at no cost to the State – services valued at \$822,807.47 to support these vulnerable clients. Further, aside from offering the services at no charge, [redacted] is left having paid \$386,732.40 in wages to DSS’s without any reimbursement. ***So, the ultimate financial burden on the Company is more than \$1.2 million for not having data in the proper form.***

[redacted] is a small company operating in a low margin service sector. The Company assigned and dispatched DSSs; who fulfilled shifts providing service pursuant to approved care plans for vulnerable Oregon citizens; [redacted] compensated the workers and provided employee benefits; and the Company executed the administrative functions necessary to operate the business. In the end, the Company produced a modest profit margin for the business.

Net income for [redacted] for 2020 was \$74,786.37. There is simply no realistic option for [redacted] to pay the overpayment amount of \$822,807.47 calculated by the Office of Program Integrity. The effect of the Office of Program Integrity enforcing the demand for reimbursement of the calculated overpayment would be, unfortunately, to immediately force [redacted] into bankruptcy – ***not because the services were not provided, but because [redacted] does not have data in the form the audit requires.*** The bankruptcy filing would in turn result in the layoff of all its employees and termination of care services to its vulnerable clients.

The assets of a service company like [redacted] are modest. The amount available for distribution in bankruptcy is approximately \$100,000 in cash reserves and physical assets with a book value of less than \$30,000, which includes a 2009 Scion, a 2010 Toyota Corolla and a 2015 Prius, along with some used office furniture and equipment.

As a consequence, the benefit to the State for pursuing the overpayment is negligible at best, as it must be assumed that the laid off employees will promptly file for unemployment insurance.

The Company has already worked with the Office of Program Integrity to implement changes in processes and procedures going forward. And _____ is certainly willing to pay a reasonable amount for what is in effect a penalty for the inability to provide data in the form the audit required. But it seems to serve none of the parties affected to force _____s out of business, its employees into unemployment, and its clients in a search for alternative services. We struggle to understand how that would serve the State of Oregon and its citizens.

Sincerely,



FISCAL AND OPERATIONS DIVISION
Program Integrity Audit Unit

Kate Brown, Governor

Oregon
Health
Authority

June 11, 2021

Lauren Kissinger
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone # 503-890-5220
FAX: 503-378-2577

E-mail: Lauren.N.Kissinger@dhsosha.state.or.us

Via Electronic Mail:

RE: Amended Final Audit Report;

Dear

The Centers for Medicare & Medicaid Services requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

The final audit for the time period of July 1, 2017 through June 30, 2018 is complete. Based upon the documentation submitted, the amended total overpayment is \$785,058.10.

Please find the attached amended final audit report and amended final audit matrix for your review.

If you have any questions, please contact me directly at 503-890-5220.

Thank you for your cooperation in this process.

Sincerely,

Lauren Kissinger, CPC, CPMA
Program Integrity Auditor
Program Integrity Audit Unit

Enclosure: Amended Final Audit Report, Accounts Receivable Invoice

CC:



FISCAL AND OPERATIONS DIVISION
Program Integrity Audit Unit

Kate Brown, Governor



Lori L. Landolt, MBA, CPMA, CPC
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone: 503-890-6820
FAX: 503-378-2577
Email: lori.l.landolt@oha.oregon.gov

June 20th, 2023

Via Certified Mail: 7015 1520 0000 9813 9627

RE: Final Audit Report; Provider

Dear

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

The final audit of paid claims with a payment date of January 1st, 2019, through April 29th, 2021, is complete. Based upon the documentation submitted, the final error rate for stratum 1-4 is 100% and the total overpayment is \$44,286.72.

Reimbursement of the overpayment is due and payable by July 20th, 2023. Please remit payment and include a copy of the invoice to the address below.

DEPARTMENT OF HUMAN SERVICES
AR & RECEIPTING UNITS, OFS
RSTARS RECEIVABLES
P O BOX 4325
PORTLAND, OR 97208-9992

If you disagree with the audit findings, you may request an appeal within 30 calendar days as outlined in the final audit report. If you choose to appeal the audit, PIAU may first schedule an informal conference to provide an opportunity to settle areas of disagreement. Any remaining unresolved issues may then be addressed in a formal administrative review or contested case hearing.

If you have any questions, please contact me directly at 503-890-6820.

Thank you for your cooperation in this process.

Sincerely,

Lori Landolt, MBA, CPMA, CDC

Lori L. Landolt, MBA, CPMA, CDC
Program Integrity Auditor
Program Integrity Audit Unit

Enclosure: Final Audit Report



May 11th, 2023

Lori L. Landolt, MBA, CPMA, CDC
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone: 503-890-6820
FAX: 503-378-2577
Email: lori.l.landolt@oha.oregon.gov

Via Certified-Mail:

RE: Preliminary Audit Report; Provider

Dear

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

The preliminary audit of paid claims with a payment date of January 1st, 2019, through April 29th, 2021, is complete. Based upon the documentation submitted, the preliminary error rate for stratum 1-4 is 100% and the combined potential overpayment is \$44,286.72.

Action requested: Please respond by June 8th, 2023.

Please review the enclosed Preliminary Audit Report and Matrix of Findings. For each finding in the matrix, indicate whether you agree or disagree, and return your comments by **June 8th, 2023**. If you disagree with a finding, please send the following information:

- A statement clearly explaining the reason(s) and evidence for your disagreement; and
- Any additional documentation that supports the services or items billed.

PIAU will review any additional documentation submitted, prepare the final audit report, and notify you of any financial impact. Additional documentation will not be accepted once the final audit report is issued.

If you have any questions, please contact me directly at 503-890-6820.

Thank you for your cooperation in this process.

Sincerely,

Lori L. Landolt, MBA, CPMA, CDC
Program Integrity Auditor
Program Integrity Audit Unit

Enclosure: Preliminary Audit Report



FISCAL AND OPERATIONS DIVISION
Office of Program Integrity

Tina Kotek, Governor

Oregon
Health
Authority

3/28/2024

Zane DuVal
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone # 971-209-6065
FAX: 503-378-2577
E-mail: zane.g.duval@oha.oregon.gov

Via Secure Email:

RE: Final Audit Report; Provider #

Dear

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

PIAU has completed the final audit of _____ for paid claims with a payment date of July 1, 2020 through August 31, 2021.

In accordance with Oregon Administrative Rule (OAR) 410-120-1396(20) reimbursement of the overpayment is due and must be paid within 30 calendar days from the postmark date or email sent date of the final audit report.

The final overpayment determination will be recovered from _____
has the right to then pursue recovery of the overpayment from ' _____

If you have any questions, please contact me directly at 971-209-6065 or by email at zane.g.duval@oha.oregon.gov.

Thank you for your cooperation in this process.

Sincerely,

Zane DuVal
Program Integrity Auditor
Program Integrity Audit Unit

CC: . . .

Enclosure: Final Audit Report



FISCAL AND OPERATIONS DIVISION
Office of Program Integrity

Tina Kotek, Governor

Oregon
Health
Authority

12/05/2023

Zane DuVal
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone # 971-209-6065
FAX: 503-378-2577
E-mail: zane.g.duval@oha.oregon.gov

Via Secure Email:

RE: Preliminary Audit Report; Provider #

Dear

The Centers for Medicare & Medicaid Services requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

The preliminary audit of paid claims with a payment date of July 1, 2020 through August 31, 2021 is complete. Based upon the documentation submitted, the preliminary error rate for stratum 1 is 100% and the potential overpayment is \$35,569.65.

Action requested: Please respond by 1/08/2024.

Please review the enclosed Preliminary Audit Report and Matrix of Findings. For each finding in the matrix, indicate whether you agree or disagree, and return your comments by **1/08/2024**. If you disagree with a finding, please send the following information:

- A statement clearly explaining the reason(s) and evidence for your disagreement; and
- Any additional documentation that supports the services or items billed.

PIAU will review any additional documentation submitted and prepare the final audit report. Additional documentation will not be accepted once the final audit report is issued. After that, please be advised:

- PIAU will recover any overpayments identified during the audit from the CCO.
- The CCO has the right to then pursue recovery from the provider.

If you have any questions, please contact me directly at 971-209-6065.

Thank you for your cooperation in this process.

Sincerely,

Zane DuVal
Program Integrity Auditor
Program Integrity Audit Unit

CC:



April 24, 2024

Eugenia Gilkey
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone: 503-580-5562
Email: eugenia.gilkey@oha.oregon.gov

Via Secure E-mail :

RE: Final Audit Report; Provider ;

Dear

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

PIAU has completed the final audit of for paid claims with a payment date of 01/06/2020 through 01/06/2022. In accordance with Oregon Administrative Rule (OAR) 410-120-1396(20) reimbursement of the overpayment is due and must be paid within 30 calendar days from the postmark date or email sent date of the final audit report. Overpayment is due by 05/24/2024.

Please contact PIAU to coordinate payment at OPI.Recoupment@oha.oregon.gov or by calling 503-890-4813. PIAU does not collect payments directly, OHA Accounts Receivable invoice will be generated and sent to LLC with instructions on how to remit payment.

If payment is not received, PIAU may take one or more of the actions described in OAR 410-120-1396(20)(b), including recouping the overpayment from future payments.

If LLC disagrees with specific audit findings, a request for an appeal may be submitted within 30 calendar days as outlined in the enclosed final audit report. If appeals the audit, PIAU may first schedule a preliminary meeting to provide an opportunity to settle areas of disagreement. Any remaining unresolved issues may then be addressed in a formal administrative review or contested case hearing.

If you have any questions, please contact me directly at 503-580-5562. Thank you for your cooperation in this process.

Eugenia Gilkey
Program Integrity Auditor
Program Integrity Audit Unit

Enclosure: Final Audit Report and Final Matrix of Findings



December 26, 2023

Eugenia Gilkey
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone: 503-580-5562
Email: eugenia.gilkey@oha.oregon.gov

Via Secure E-mail:

RE: Preliminary Audit Report; Provider #

Dear _____ :

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

The preliminary audit of paid claims with a payment date of 01/06/2020 through 01/06/2022 is complete. Based upon the documentation submitted, the preliminary error rate for stratum 1, 2 and 3 combined is 76% and the potential overpayment is \$37,339.88.

Action requested: Please respond by January 26, 2024.

Please review the enclosed Preliminary Audit Report and Matrix of Findings. For each finding in the matrix, indicate whether you agree or disagree, and return your comments by January 26, 2024. If you disagree with a finding, please send the following information:

- A statement clearly explaining the reason(s) and evidence for your disagreement; and
- Any additional documentation that supports the services or items billed.

PIAU will review any additional documentation submitted, prepare the final audit report, and notify you of any financial impact. Additional documentation will not be accepted once the final audit report is issued.

If you have any questions, please contact me directly at 503-580-5562.

Thank you for your cooperation in this process.

Sincerely,

Eugenia Gilkey
Government Auditor
Program Integrity Audit Unit

Enclosure: Preliminary Audit Report



FISCAL AND OPERATIONS DIVISION
 Program Integrity Audit Unit

Kate Brown, Governor



Rebecca Reynolds
 3406 Cherry Avenue NE
 Salem, Oregon 97303-4924
 Phone # 971-240-7119
 FAX: 503-378-2577

E-mail: Rebecca.L.Reynolds@dhsosha.state.or.us

October 6, 2022

Via Secure Email:

RE: Amended Final Audit Report; Provider #

Dear

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

The final audit of paid claims for the time period of 09/20/2019 through 03/30/2020 is complete. Based upon the documentation submitted, the final error rate for stratum 1 is 30% and the total overpayment is \$ 5,737.79.

Reimbursement of the overpayment is due and payable by October 7, 2022. Please remit payment in the enclosed envelope and include a copy of the invoice to the address below.

DEPARTMENT OF HUMAN SERVICES
 AR & RECEIPTING UNITS, OFS
 RSTARS RECEIVABLES
 P O BOX 4325
 PORTLAND, OR 97208-9992

If you disagree with the audit findings, you may request an appeal within 30 calendar days as outlined in the final audit report. If you choose to appeal the audit, PIAU may first schedule an informal conference to provide an opportunity to settle areas of disagreement. Any remaining unresolved issues may then be addressed in a formal administrative review or contested case hearing.

If you have any questions, please contact me directly at 971-240-7119.

Thank you for your cooperation in this process.

Sincerely,

Rebecca Reynolds
 Program Integrity Auditor
 Program Integrity Audit Unit

Enclosure: Final Audit Report



FISCAL AND OPERATIONS DIVISION
Program Integrity Audit Unit

Kate Brown, Governor



September 7, 2022

Rebecca Reynolds
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone # 971-240-7119
FAX: 503-378-2577

E-mail: Rebecca.L.Reynolds@dhsosha.state.or.us

Via Secure Email.

RE: Final Audit Report; Provider

Dear

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

The final audit of paid claims for the time period of 09/20/2019 through 03/30/2020 is complete. Based upon the documentation submitted, the final error rate for stratum 1 is 37% and the total overpayment is \$7,029.43.

Reimbursement of the overpayment is due and payable by October 7, 2022. Please remit payment in the enclosed envelope and include a copy of the invoice to the address below.

DEPARTMENT OF HUMAN SERVICES
AR & RECEIPTING UNITS, OFS
RSTARS RECEIVABLES
P O BOX 4325
PORTLAND, OR 97208-9992

If you disagree with the audit findings, you may request an appeal within 30 calendar days as outlined in the final audit report. If you choose to appeal the audit, PIAU may first schedule an informal conference to provide an opportunity to settle areas of disagreement. Any remaining unresolved issues may then be addressed in a formal administrative review or contested case hearing.

If you have any questions, please contact me directly at 971-240-7119.

Thank you for your cooperation in this process.

Sincerely,

Rebecca Reynolds
Program Integrity Auditor
Program Integrity Audit Unit

Enclosure: Final Audit Report



June 6, 2022

Rebecca Reynolds
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone # 971-240-7119
FAX: 503-378-2577

E-mail: Rebecca.L.Reynolds@dhsosha.state.or.us

Via Secure Email: .

RE: Preliminary Audit Report; Provider #

Dear Provider:

The Centers for Medicare & Medicaid Services requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

The preliminary audit for the time period of 09/20/2019 through 03/30/2020 is complete. Based upon the documentation submitted, the preliminary error rate for stratum 1 is 100% and the potential overpayment is \$19,697.31.

Action requested: Please respond by July 6, 2022.

Please review the enclosed Preliminary Audit Report and Matrix of Findings. For each finding in the matrix, indicate whether you agree or disagree, and return your comments by July 6, 2022. If you disagree with a finding, please send the following information:

- A statement clearly explaining the reason(s) and evidence for your disagreement; and
- Any additional documentation that supports the services or items billed.

PIAU will review any additional documentation submitted, prepare the final audit report, and notify you of any financial impact. Additional documentation will not be accepted once the final audit report is issued.

If you have any questions, please contact me directly at 971-240-7119.

Thank you for your cooperation in this process.

Sincerely,

Rebecca Reynolds
Program Integrity Auditor
Program Integrity Audit Unit

Enclosure: Preliminary Audit Report



January 8, 2024

Rebecca Reynolds
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone: 971-240-7119
FAX: 503-378-2577

Email: Rebecca.L.Reynolds@dhsaha.state.or.us

Via Secure E-mail:

RE: Final Audit Report; Provider

Dear Sam Ewing, Administrator:

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

PIAU has completed the final audit of Integrated Health Clinics LLC for paid claims with a payment date of March 1, 2018 through February 28, 2019. In accordance with Oregon Administrative Rule (OAR) 410-120-1396(20) reimbursement of the overpayment is due and must be paid within 30 calendar days from the postmark date or email sent date of the final audit report. Overpayment is due by February 7, 2024.

Please contact PIAU to coordinate payment at OPI.Recoupment@oha.oregon.gov or by calling 503-890-4813. PIAU does not collect payments directly, OHA Accounts Receivable invoice will be generated and sent to Integrated Health Clinics LLC with instructions on how to remit payment.

If payment is not received, PIAU may take one or more of the actions described in OAR 410-120-1396(20)(b), including recouping the overpayment from future payments.

If Integrated Health Clinics LLC disagrees with specific audit findings, a request for an appeal may be submitted within 30 calendar days as outlined in the enclosed final audit report. If Integrated Health Clinics LLC appeals the audit, PIAU may first schedule a preliminary meeting to provide an opportunity to settle areas of disagreement. Any remaining unresolved issues may then be addressed in a formal administrative review or contested case hearing.

If you have any questions, please contact me directly at 971-240-7119. Thank you for your cooperation in this process.

Rebecca Reynolds
Program Integrity Auditor
Program Integrity Audit Unit

Enclosure: Final Audit Report and Final Matrix of Findings



10/11/2023

Rebecca Reynolds
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone # 971-240-7119
FAX: 503-378-2577

E-mail: Rebecca.L.Reynolds@dhsosha.state.or.us

Via Secure E-Mail:

RE: Preliminary Audit Report; Provider

Dear Administrator:

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

The preliminary audit of paid claims with a payment date of 3/1/2018 through 2/28/2019 is complete. Based upon the documentation submitted, the preliminary error rate for stratum 1 is 40%, stratum 2 is 10%, stratum 3 is 15%, stratum 4 is 4% the combined potential overpayment is \$4,575.71.

Action requested: Please respond by 11/10/2023.

Please review the enclosed Preliminary Audit Report and Matrix of Findings. For each finding in the matrix, indicate whether you agree or disagree, and return your comments by **11/10/2023**. If you disagree with a finding, please send the following information:

- A statement clearly explaining the reason(s) and evidence for your disagreement; and
- Any additional documentation that supports the services or items billed.

PIAU will review any additional documentation submitted, prepare the final audit report, and notify you of any financial impact. Additional documentation will not be accepted once the final audit report is issued.

If you have any questions, please contact me directly at 971-240-7119.

Thank you for your cooperation in this process.

Rebecca Reynolds
Program Integrity Auditor
Program Integrity Audit Unit

Enclosure: Preliminary Audit Report



FISCAL AND OPERATIONS DIVISION
Office of Program Integrity
Tina Kotek, Governor



January 8, 2024

Rebecca Reynolds
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone: 971-240-7119
FAX: 503-378-2577

Email: Rebecca.L.Reynolds@dhsoha.state.or.us

Via Secure E-mail: _____

RE: Final Audit Report; Provider

Dear Administrator:

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

PIAU has completed the final audit of _____ for paid claims with a payment date of March 1, 2018 through February 28, 2019. In accordance with Oregon Administrative Rule (OAR) 410-120-1396(20) reimbursement of the overpayment is due and must be paid within 30 calendar days from the postmark date or email sent date of the final audit report. Overpayment is due by February 7, 2024.

Please contact PIAU to coordinate payment at OPI.Recoupment@oha.oregon.gov or by calling 503-890-4813. PIAU does not collect payments directly, OHA Accounts Receivable invoice will be generated and sent to _____ LLC with instructions on how to remit payment.

If payment is not received, PIAU may take one or more of the actions described in OAR 410-120-1396(20)(b), including recouping the overpayment from future payments.

If _____ disagrees with specific audit findings, a request for an appeal may be submitted within 30 calendar days as outlined in the enclosed final audit report. If _____ appeals the audit, PIAU may first schedule a preliminary meeting to provide an opportunity to settle areas of disagreement. Any remaining unresolved issues may then be addressed in a formal administrative review or contested case hearing.

If you have any questions, please contact me directly at 971-240-7119. Thank you for your cooperation in this process.

Rebecca Reynolds
Program Integrity Auditor
Program Integrity Audit Unit

Enclosure: Final Audit Report and Final Matrix of Findings



10/11/2023

Rebecca Reynolds
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone # 971-240-7119
FAX: 503-378-2577
E-mail: Rebecca.L.Reynolds@oha.oregon.gov

Via Secure E-Mail:

RE: Preliminary Audit Report; Provider .

Dear _____, Administrator:

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

The preliminary audit of paid claims with a payment date of 3/1/2018 through 2/28/2019 is complete. Based upon the documentation submitted, the preliminary error rate for stratum 1 is 53%, stratum 2 is 53%, stratum 3 is 18%, stratum 4 is 30% and the combined potential overpayment is \$31,902.85.

Action requested: Please respond by 11/10/2023 .

Please review the enclosed Preliminary Audit Report and Matrix of Findings. For each finding in the matrix, indicate whether you agree or disagree, and return your comments by **11/10/2023**. If you disagree with a finding, please send the following information:

- A statement clearly explaining the reason(s) and evidence for your disagreement; and
- Any additional documentation that supports the services or items billed.

PIAU will review any additional documentation submitted, prepare the final audit report, and notify you of any financial impact. Additional documentation will not be accepted once the final audit report is issued.

If you have any questions, please contact me directly at 971-240-7119 or Rebecca.L.Reynolds@oha.oregon.gov.

Thank you for your cooperation in this process.
Sincerely,

Rebecca Reynolds
Program Integrity Auditor
Program Integrity Audit Unit

Enclosure: Preliminary Audit Report



FISCAL AND OPERATIONS DIVISION
Office of Program Integrity
Tina Kotek, Governor



January 8, 2024

Rebecca Reynolds
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone: 971-240-7119
FAX: 503-378-2577

Email: Rebecca.L.Reynolds@dhsosha.state.or.us

Via **Secure E-mail**:

RE: Final Audit Report; Provider .

Dear _____, Administrator:

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

PIAU has completed the final audit of _____ for paid claims with a payment date of March 1, 2018 through February 28, 2019. In accordance with Oregon Administrative Rule (OAR) 410-120-1396(20) reimbursement of the overpayment is due and must be paid within 30 calendar days from the postmark date or email sent date of the final audit report. Overpayment is due by February 7, 2024.

Please contact PIAU to coordinate payment at OPI.Recoupment@oha.oregon.gov or by calling 503-890-4813. PIAU does not collect payments directly, OHA Accounts Receivable invoice will be generated and sent to _____, with instructions on how to remit payment.

If payment is not received, PIAU may take one or more of the actions described in OAR 410-120-1396(20)(b), including recouping the overpayment from future payments.

If _____ disagrees with specific audit findings, a request for an appeal may be submitted within 30 calendar days as outlined in the enclosed final audit report. If _____ appeals the audit, PIAU may first schedule a preliminary meeting to provide an opportunity to settle areas of disagreement. Any remaining unresolved issues may then be addressed in a formal administrative review or contested case hearing.

If you have any questions, please contact me directly at 971-240-7119. Thank you for your cooperation in this process.

Rebecca Reynolds
Program Integrity Auditor
Program Integrity Audit Unit

Enclosure: Final Audit Report and Final Matrix of Findings



10/11/2023

Rebecca Reynolds
3406 Cherry Avenue NE
Salem, Oregon 97303-4924
Phone # 971-240-7119
FAX: 503-378-2577

E-mail: Rebecca.L.Reynolds@dhsosha.state.or.us

Via Secure E-Mail:

RE: Preliminary Audit Report; Provider

Dear

The Centers for Medicare & Medicaid Services (CMS) requires state Medicaid agencies to ensure appropriate use of federal Medicaid funds. As the single state agency that administers Oregon's Medicaid program, the Oregon Health Authority (OHA) Program Integrity Audit Unit (PIAU) conducts periodic audits of Oregon Medicaid providers.

The preliminary audit of paid claims with a payment date of 3/1/2018 through 2/28/2019 is complete. Based upon the documentation submitted, the preliminary error rate for stratum 1-3 is 71%, stratum 4 is 50% and the combined potential overpayment is \$16,931.02.

Action requested: Please respond by 11/10/2023.

Please review the enclosed Preliminary Audit Report and Matrix of Findings. For each finding in the matrix, indicate whether you agree or disagree, and return your comments by **11/10/2023**. If you disagree with a finding, please send the following information:

- A statement clearly explaining the reason(s) and evidence for your disagreement; and
- Any additional documentation that supports the services or items billed.

PIAU will review any additional documentation submitted, prepare the final audit report, and notify you of any financial impact. Additional documentation will not be accepted once the final audit report is issued.

If you have any questions, please contact me directly at 971-240-7119.

Thank you for your cooperation in this process.

Rebecca Reynolds
Program Integrity Auditor
Program Integrity Audit Unit

Enclosure: Preliminary Audit Report