A hand holding a magnifying glass over a document on a laptop screen. The background is a blurred image of a person in a blue suit.

These slides  
accompany the 2025  
UOIG FWA Prevention  
Training.

Please attend the  
training to fulfil your  
training requirement for  
Medicaid Fraud, Waste,  
and Abuse Prevention.



Utah Office of  
Inspector General

# Outline

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UOIG Overview

FWA Improper Payments

Common FWA Schemes

High Risk Program Areas

The False Claims Act

Payment Suspensions

Reporting FWA to the UOIG

Provider Resources

UOIG Contact Information



UOIG Goal

Eliminate  
Medicaid Fraud,  
Abuse,  
and Waste

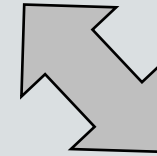
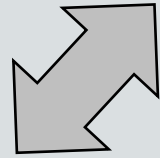




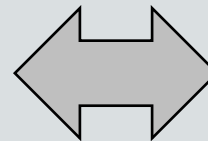


The Office of Inspector General of Medicaid Services will protect taxpayer dollars by identifying fraud, abuse, and waste risks and vulnerabilities in the State Medicaid Program and by taking action to mitigate or eliminate those risks.

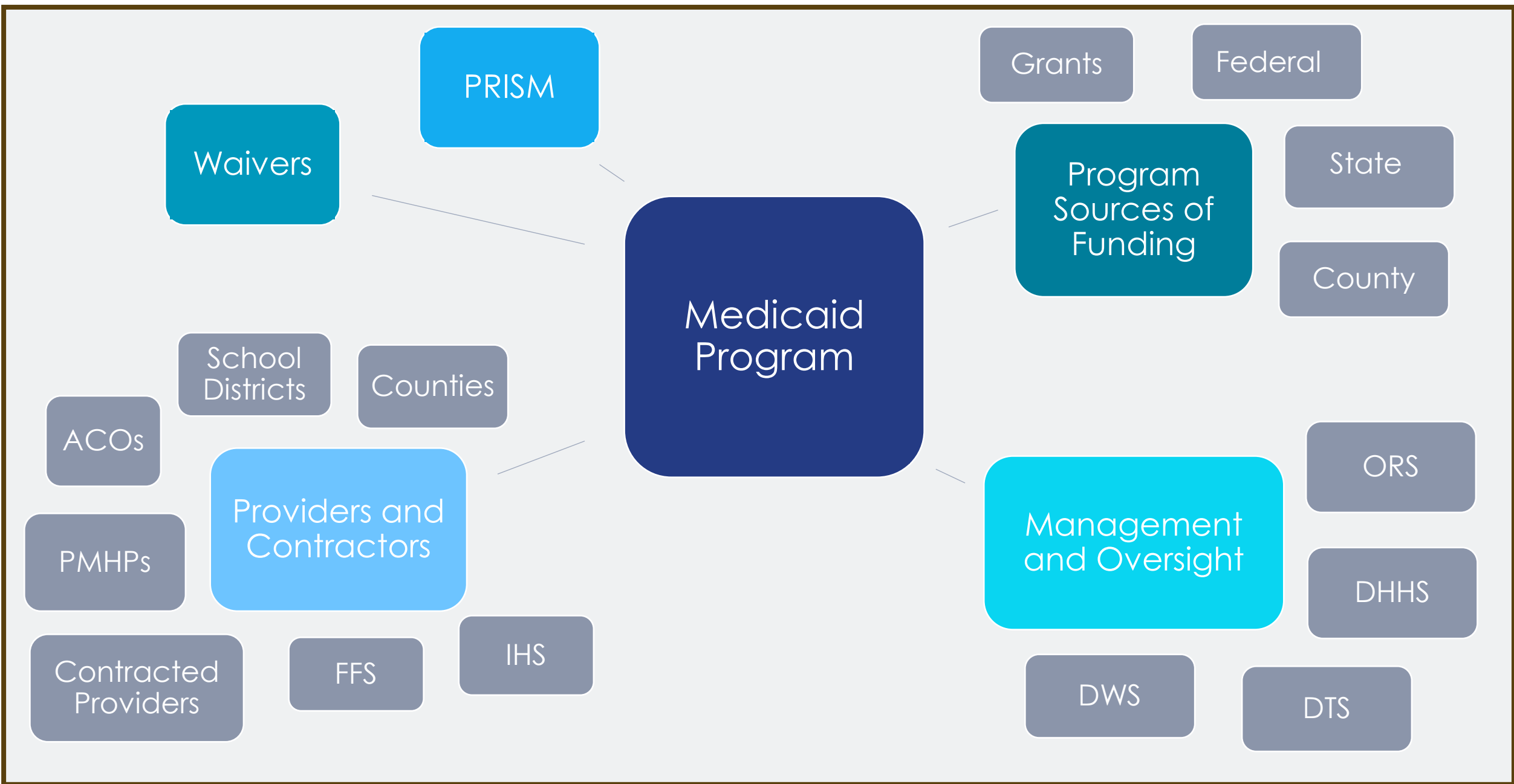
UOIG Mission



Policy  
Recommendations  
& Procedural  
Opportunities

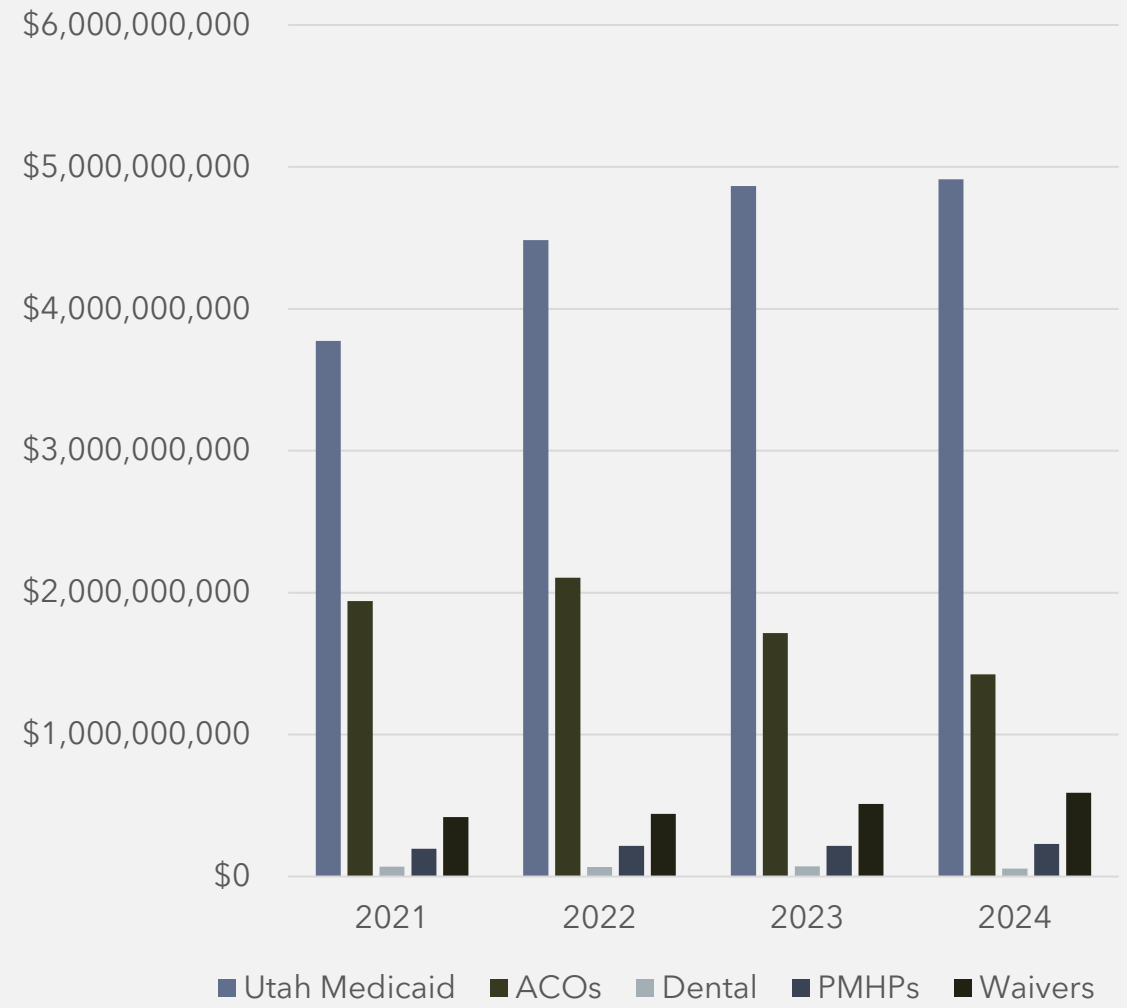


Review of Claims  
History

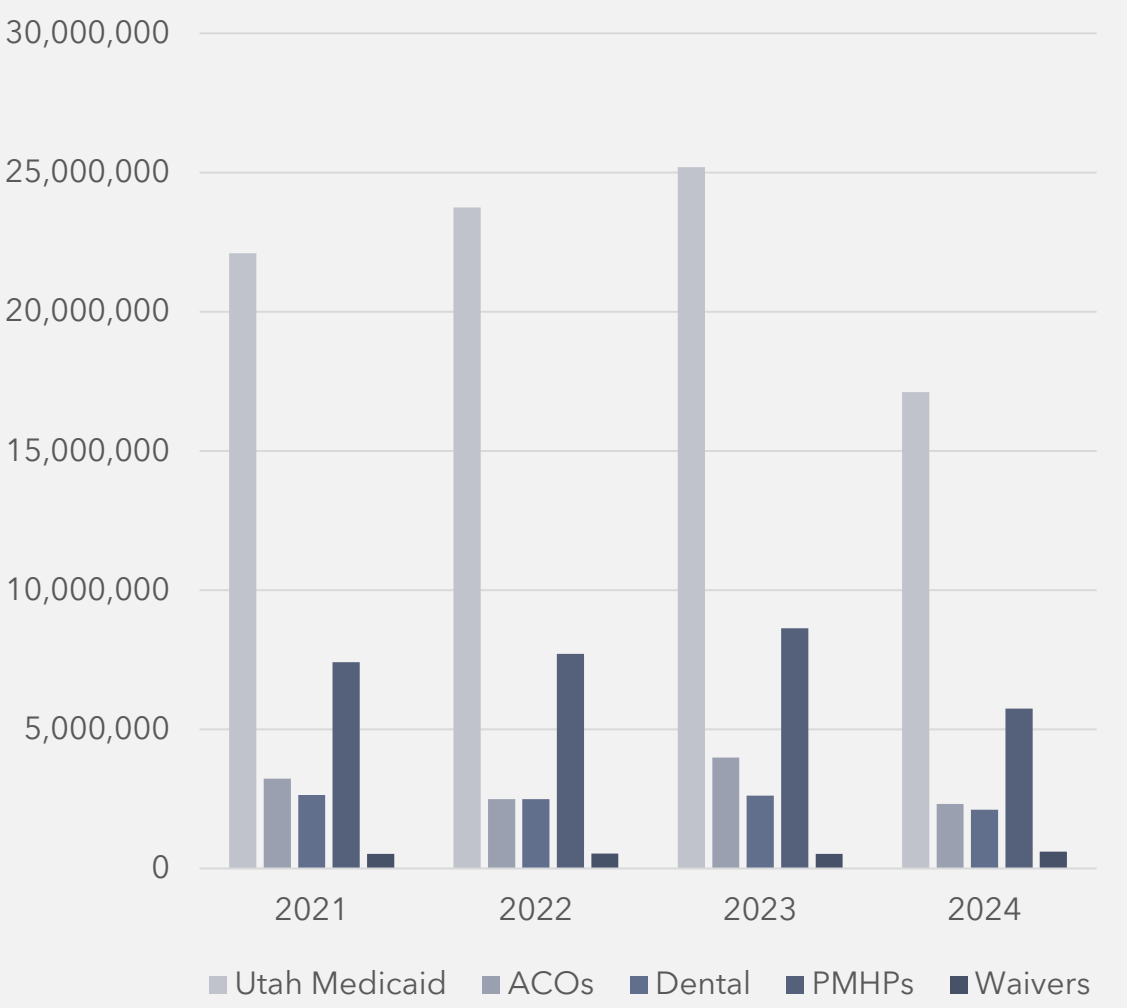


# Utah Medicaid

Total Expenditures

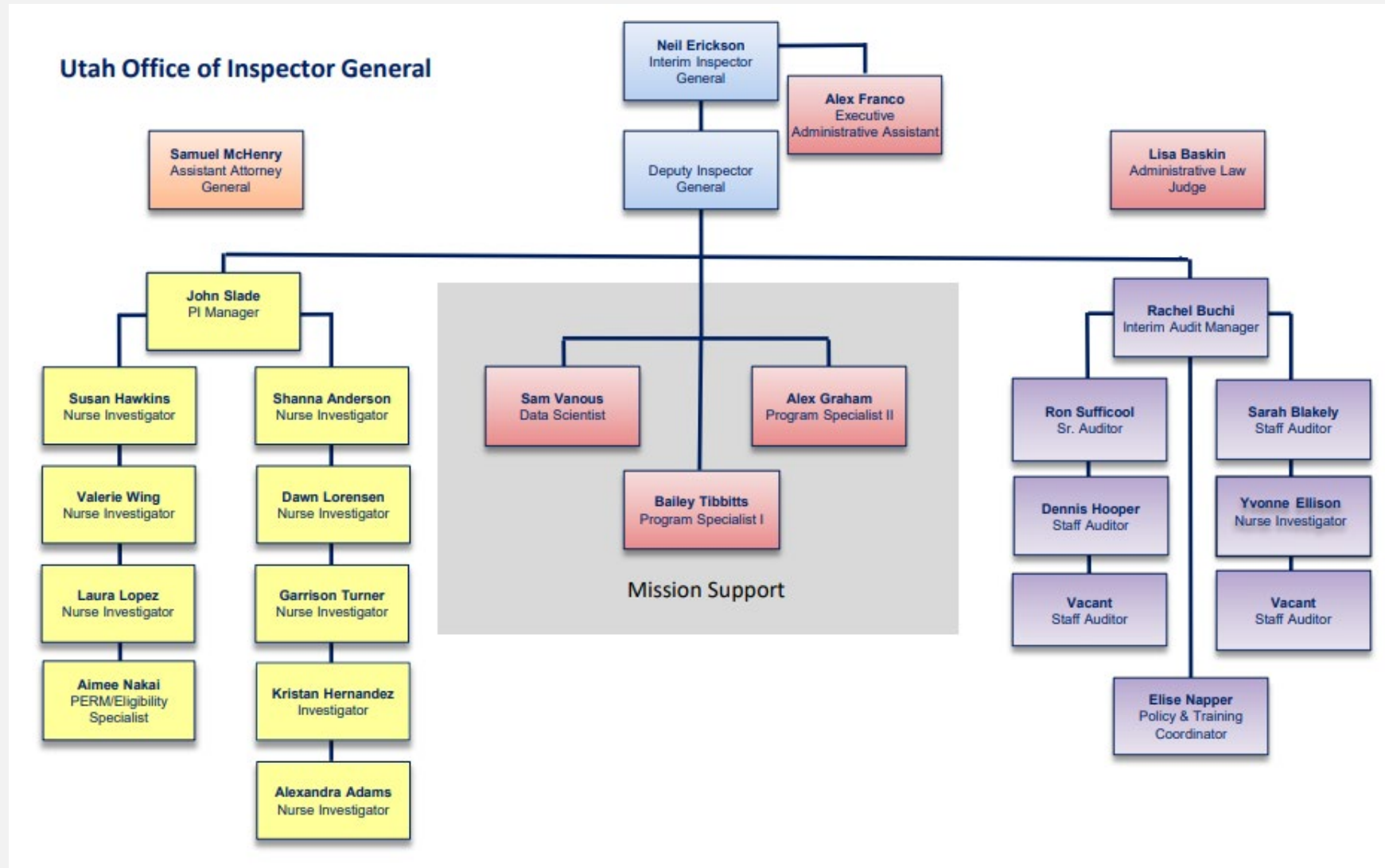


Number of Claims/Capitations





# UOIG Org Chart







# UOIG Audits

Must Remain Independent

Reviews Policy & Procedure

Reviews What Has Occurred

Makes Recommendations

Tests Controls

# UOIG Program Integrity & Investigations

Receives Complaints

Conducts Preliminary Reviews

Identifies Overpayment Amounts

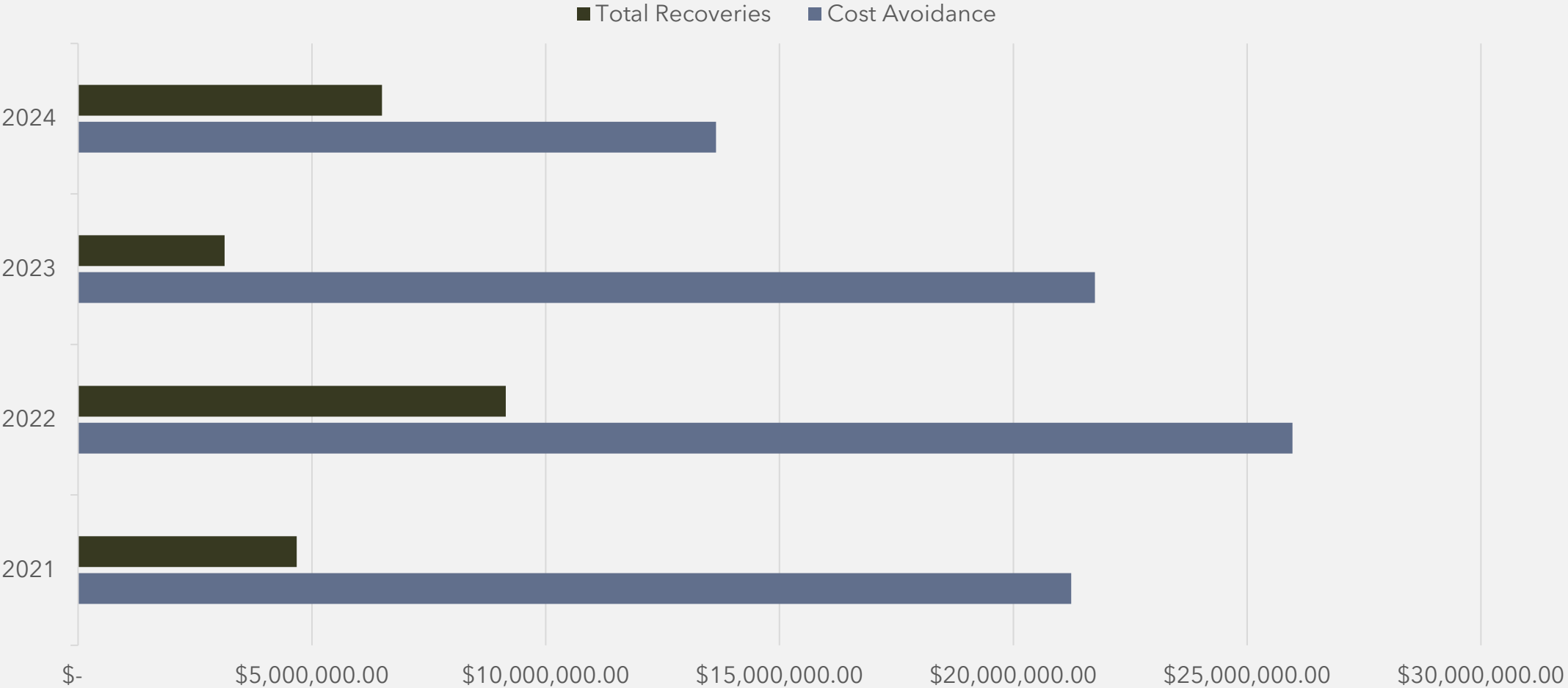
Issues Notices of Recovery

Program Integrity Functions



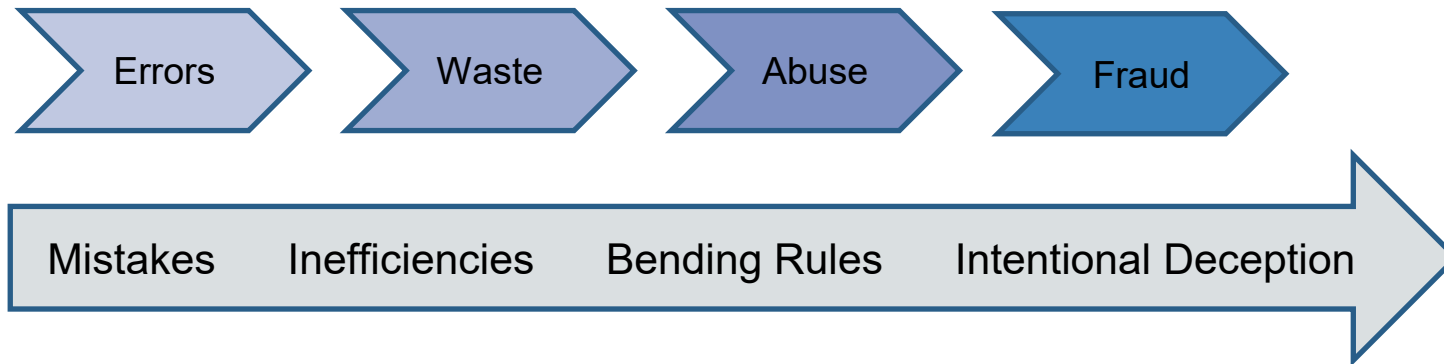
**INVESTIGATION**

# UOIG Recent Recoveries





# Causes of Improper Payments



Most common payment errors:

- Insufficient documentation
- Unintentional billing errors



Q. Who might perpetrate fraud against Medicaid?

A. Anyone who can influence the outcome of service provision, billing, records and documentation, or eligibility



# Common Provider FWA Examples

Billing for services not rendered  
and/or supplies not provided

Double billing

Coding schemes:

- Unbundling
- Upcoding

Altering medical documentation  
or claim forms

Misrepresentation of medical  
conditions or services

Soliciting, offering or receiving a  
kickback, bribe or rebate

Failure to report third party liability  
in billing



A close-up photograph of a medical stethoscope with a silver chest piece and white tubing. The stethoscope is resting on a green calculator with white and red keys. In the background, a medical form is visible with fields for 'Date of Birth', 'City', 'GROUP #', and 'DAYS DUE AT THE TIME'.

# Balance Billing

“A provider who accepts a member as Medicaid patient must accept the Medicaid or state payment as reimbursement in full”

# Unlikely Hours

“...services must be administered by agency staff only as ordered by a physician and approved in the plan of care.”



OPEN  
24 Hrs



The background of the slide features a blurred, blue-toned image of several people walking away from the camera. The figures are out of focus, creating a sense of movement and anonymity. The lighting is soft, with some areas appearing brighter than others, suggesting an indoor setting with ambient light.

# Ghost Employees

“Providers are prohibited from submitting inaccurate Medicaid claims.”



# Drug Diversion

“The Medicaid Pharmacy program reimburses for covered outpatient drugs dispensed to eligible Medicaid members by a pharmacy enrolled with Utah Medicaid pursuant to a prescription from an enrolled prescriber...”

A photograph of a row of colorful mailboxes mounted on a wooden post-and-rail fence. The mailboxes are in various colors including white, green, blue, and yellow, and some have numbers like 57, 9A, 117, 102, 37, 153, 47, 167, 134, and 26. The background shows green foliage and trees under a clear sky.

# Eligibility Schemes

“To be eligible for Medicaid, you must meet a program type and meet the rules for Utah residency, income, and citizenship.”

A hand holding a black and gold pen is positioned over a form. The form has a section titled 'Personal Information' and contains various fields for data entry. In the background, a blue binder is visible.

# Reassignment of Billing Scheme

“As an approved Medicaid Provider, you are able to manage and update your information in PRISM.”



# Personal Care/ Home Health

Fraud, Waste, and Abuse Prevention



# Transportation

Fraud Waste, and Abuse Prevention



# Behavioral Health Related Organizations

Fraud, Waste, and Abuse Prevention



# Telehealth

Fraud, Waste, and Abuse Prevention



# Fiscal Responsibility

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Deficit Reduction Act

Federal False Claims Act

Utah False Claims Act

Qui Tam Incentives &  
Whistleblower Protections

Provider Agreements

Medicaid Contractual  
Obligations



# False Claims Acts

31 USC §§ 3729 – 3733  
& UT Code 26B-3-1106

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A person who knowingly submits a false claim is liable for up to three times the amount of the federal government's damages, plus penalties of \$14,308 to \$28,619 per claim.



## Examples of False Claims:

- Wholly or partially false claims
- Claims for services which are not provided
- Claims for items or materials which are not delivered
- Claims that misrepresent the type, quality, or quantity of services or items rendered
- Claims for services which are not medically necessary
- Claims for services covered by other private sources
- Claims where a provider unbundles a product, procedure, or group of procedures that are usually bundled, and bills for each item separately



Whistleblowers expose activities that are illegal, illicit, unsafe, wasteful, fraudulent, or an abuse of taxpayer funds.

### Whistleblowers Protections:

- Retaliation
- Intimidation
- Demotion
- Loss of Job

### Qui Tam Incentives





# LEIE

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The LEIE is a regularly updated list of individuals who are excluded from receiving Medicaid payments and reimbursement.

Anyone who hires an individual or entity on the LEIE may be subject to civil monetary penalties.

The UOIG recommends regular, routine checks of the LEIE, to ensure that staff and contractors are not listed.


<https://exclusions.oig.hhs.gov/>



# Payment Suspension

## 42 CFR §455.23

“The State Medicaid agency must suspend all Medicaid payments to a provider after the agency determines there is a credible allegation of fraud for which an investigation is pending...”

A grayscale image of a hand holding a red rectangular sign. The sign has the word 'STOP' in red capital letters on a white background, and the word 'FRAUD' in white capital letters on a red background.

# Utah Code 63A-13-501

“A health care professional, a provider, or a state or local government official or employee who becomes aware of fraud, waste, or abuse shall report the fraud, waste, or abuse to the Office”

# Reporting to the UOIG



Suspected Fraud, Waste or Abuse must be reported to The Utah Office of Inspector General.

Reports can come from anyone and can be anonymous.

Please call the UOIG Hotline:

**(855) 403-7283**

Email us:

**MPI@utah.gov**

Or submit a referral online on our website:

**<https://oig.utah.gov/>**





# Medicaid Policies Change Frequently

Always follow the Medicaid policy that is in effect at the time of service.

Always adhere to Medicaid service record documentation requirements.

# Policy Resources for Providers

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Medicaid Information Bulletins  
(MIBS)

Medicaid Provider Manuals

Utah Administrative Rules

Medicaid Contracts

State Plan and Waiver Plans

CMS



# Records Requests

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Records must be submitted within 30 calendar days.

Ensure your contact information in PRISM remains up-to-date.

If you telework, update your contact information and check your office mail and voicemail regularly.



A woman with dark hair in a bun, wearing a grey blazer and hoop earrings, stands with her back to the camera, gesturing towards a group of people. The group consists of several individuals of various ethnicities and ages, some looking at the presenter and others at their phones. The background is a blurred office environment with blue and white tones.

# Training Opportunities

The UOIG is available to provide training directly to professional organizations, and to tailor the content of the training to each audience.

Please contact us to discuss your training needs.

# UOIG Contacts

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The UOIG is  
available to  
assist with any  
questions you  
may have

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801-538-6532

<https://oig.utah.gov>