Office of the Medicaid Inspector General Transparency Plan

I.   Public Engagement
  - The Office of the Medicaid Inspector General (OMIG) routinely reviews its policies and procedures to determine any needed improvements or additional points of accessibility to information. These reviews occur at least annually from an agency planning perspective, but also as any program requirements change or the Agency receives feedback from external stakeholders.

  - **How the agency interacts with the public**
    - OMIG leadership testifies each year at the Joint Legislative Hearings on the Budget. The Medicaid Inspector General delivers testimony and answers questions posed by the Senate and Assembly in order to provide insight into agency operations and on issues of importance to the public.
    - As OMIG undertakes new or updated program integrity initiatives, the Agency will engage stakeholders to gather feedback for consideration in implementing program changes. This includes the development or amending of regulations, guidance documents and fee-for-service audit protocols.
    - OMIG has a dedicated email where the public and program stakeholders can request information from the Agency (information@omig.ny.gov). The mailbox is checked daily, and all requests are responded to in a timely manner.
    - OMIG maintains a public website (https://omig.ny.gov/) that includes information on:
      - providers excluded from the Medicaid program,
      - how to self-disclose overpayments received from the Medicaid program,
      - how to report Medicaid fraud,
      - Freedom of Information Law (FOIL) requests,
      - language assistance services,
      - news stories highlighting the Agency's participation in investigations of Medicaid fraud,
      - final audit reports, and
      - agency publications such as Annual Reports, Work Plans, audit protocols and guidance documents.
    - OMIG also has a presence on Twitter (@NYSOMIG), Facebook, and LinkedIn where the Agency shares pertinent information related to NYS and Medicaid program integrity.

- o The most frequent inquiries received by the Agency pertain to individuals and entities identified on OMIG's Medicaid Exclusion list, compliance-related matters, and audit processes and protocols. As noted above, OMIG provides access to all this information on its public website and has contact information for the specific areas within the Agency that handle these matters so that if an individual needs more information than what is presented, they can reach a subject matter expert who can assist them.
  - o Information about Medicaid fraud, including how to report suspected cases, is of prime interest to the public. At the top of the OMIG public website and within a Medicaid Fraud tab, is information on how to report suspected fraud, which is available in all languages in accordance with language access requirements. This information is also made available monthly in the DOH publication the *Medicaid Update,* on any posters or brochures shared with the public, and at each presentation OMIG conducts.
  - o OMIG promotes and encourages input and information from the public regarding Medicaid fraud across all communication forums, including the Agency's public website, social media, in presentations and public events, and in collateral materials (OMIG brochures, posters, and informational materials, etc.).
- OMIG participates in a wide range of community/stakeholder outreach activities, which include conferences, symposiums, and community events, among others. Staff from across the Agency participate in these activities, lending their expertise to the relevant subject matter/theme or topic on which the event or activity is based.
- OMIG will continue to seek out and maximize opportunities to connect with our stakeholders and the public.

II. <u>Proposed Plan to Expand Transparency and Expected Timeline</u>

Public website:
- Working closely with WebNY, OMIG recently transitioned its website to a far-more advanced solution, which affords increased in-house ability to update/maintain information. In turn, this provides the general public and stakeholders easier/more efficient access to resources and critical information about the Agency.
- OMIG has translated all relevant public facing documents in accordance with the latest requirements under Language Access. Further, OMIG utilizes social media on an ongoing basis, in concert with other communications channels, to keep the public/stakeholders informed.

- OMIG continues to identify content and explore opportunities to further improve its public website to provide informative materials, data and resources to its stakeholders and the public, with a visual aesthetic that is easy to navigate, presents information in a dynamic manner while also making it clear and accessible to those visiting the site.

Reporting:
- OMIG posts on its website and communicates via its listserv, social media and, as appropriate, mass media, mandated reports, which include the Agency's Annual Report, and other non-mandated agency-specific documents, like our Work Plan, intended to inform the public and stakeholders about the activities to be undertaken by OMIG over a particular timeframe.
- OMIG will continue to use these channels to enhance communications to our stakeholders and the public to both explain our methods and inform them of our role within the health care policy continuum.

Ensuring use of the Project Sunlight database in accordance with the Public Integrity Reform Act of 2011:
- OMIG is in compliance with requirements and will continue to collect information regarding appearances before the Agency, ensuring inclusion of both in-person and video appearances, and provide public access to this information via the Project Sunlight database. Appearances will continue to be timely entered into the database within five (5) business days.
- OMIG Office of Counsel (OC) staff assigned to Project Sunlight will review its policy, any related documents, and the database to ensure that they are current and consistent with the Public Integrity Reform Act of 2011.
- OMIG OC staff will also keep Agency personnel updated regarding Project Sunlight directives and compliance, as necessary and appropriate.

Improving response time for all Freedom of Information Law requests, including by tracking monthly backlogs of outstanding requests and new requests, and by proactively posting frequently requested information or complete requests online:
- OMIG will continue to prioritize timely responses to requests for records made under the Freedom of Information Law (FOIL). OMIG does not commonly have a backlog of pending FOIL requests; however, it will enhance its FOIL tracking procedures to highlight any requests outstanding for more than one month.
- The Agency will review past FOIL requests to identify records which can be proactively posted to OMIG's public website to enhance public access to commonly requested records.

Reducing or eliminating the costs associated with providing data or records:
- Since its creation, OMIG has not required payment for production of records under FOIL.

Updating records retention policies, including ensuring the timely transfer of pertinent records to the State Archives:

- OMIG will review its records retention policy to ensure that it is current and comprehensive with respect to the categories of records that the Agency maintains.
- OMIG's Agency Policy and Procedures Manual (APPM) specific to Records Retention and Disposition was updated on March 31, 2021. OMIG's Bureau of Operations Management, which serves as the liaison between OMIG's divisional staff and the State Records Center, regularly works with liaisons from each OMIG Division to ensure all retention and disposition policies are being followed appropriately; and OMIG provides training to new divisional liaisons placed in these roles.
- OMIG Executive Management will continue messaging the importance of adhering to these policies to OMIG Divisional Management and line staff.

- As noted previously, OMIG routinely reviews its policies and procedures, public website, documents and reports available to the public. These reviews occur at least annually, but also as any program requirements change or when the Agency receives feedback from its stakeholder community.

- OMIG has agency staff dedicated to regularly reviewing, assessing, and improving, when necessary, all the information and sources outlined above, including FOIL requests received to determine any needed improvements or to consider additional points of accessibility to information. The Agency is committed to maintaining and expanding access to information in order to demonstrate transparency to program stakeholders and the public.

III.   Measures of Success and Long-term Monitoring

OMIG will perform regular reviews and assessments of the Agency's continued efforts to provide transparency to the public. In order to ensure that OMIG's initiatives are serving to increase transparency and expand opportunities for public access to information, the Agency will:

- monitor activity on its public website and social media to identify areas of public interest;
- utilize feedback from presentations made at conferences, symposiums or to community-based organizations to provide clarity and additional detail on the Agency's mission and activities;
- review FOIL requests to determine common themes to determine if there are additional areas of information that can be made readily available to the public; and,

- continue to solicit public input and engage with program stakeholders to provide clear direction and guidance on program integrity expectations and outcomes.