

March 30, 2023



Introductions

Panelists

- Joseph Pika, Director, Division of Payment Integrity Improvement, U.S. Department of Health and Human Services
- **S. Benita Turner**, Senior Risk Management and Compliance Officer, Office of Inspector General Liaison, Administration for Children and Families

Moderator

• Caroline Berk, Principal, Kearney & Company

Payment Integrity

Risk Assessments

- Review all programs and activities over \$10 million in annual outlays at least once every three years.
- Consider relevant risk factors in a quantitative or qualitative approach.

Public Reporting

- Report results of payment integrity risk assessments and measurements annually in the Agency Financial Report or Performance and Accountability Report.
- Report additional information to PaymentAccuracy.gov.

Measurements

- Apply to programs determined to be susceptible to significant improper payments (1.5% and \$10 million in improper payments, or \$100 million in improper payments).
- Meet statistical requirements in OMB guidance.

Payment Integrity Risk Assessment Phases

Phase 1 – Conducting a risk assessment

- Programs or activities with annual outlays over \$10,000,000 must conduct a risk assessment at least once every three years to determine if the program is likely to have Improper (IP) and Unknown (UP) Payments above the statutory threshold
- Newly established programs after the first 12 months
- As determined by OMB on a caseby-case basis

Phase 2 – Calculating and reporting an error rate

- Deemed to be susceptible to significant IPs in Phase 2
- Designated as high-risk by an oversight body such as OMB

Recent Phase One Changes & Improvements

HHS worked alongside the Divisions to implement the following changes over the past four years.

- Revised risk assessment process, including questionnaire and scoring methodology
- Completed Risk Assessment Portal (RAP) Phase 1.0

2020

2019

 Began to implement an Automated Improper Payment Framework tool

- Finalized additional policies and procedures
- Developed methodology for establishing an inventory of programs by utilizing HHS DATA Act information

 Minor changes to risk assessment process, including questionnaire and scoring methodology

• Completed RAP Phase 2.1

Begin to refine program inventory and selection process

2022

2021

- Minor changes to risk assessment process, including questionnaire and scoring methodology
- Completed RAP Phase 2.0
- Included and assessed COVID-funded programs



Audience Questions

KEARNEY SUCCESSION OF THE COMPANY T104 ESG: Integrating Payment Integrity Data for Better Decisions

March 30, 2023



Polling Question 1

Have you been involved with payment integrity activities at your agency?

- a. Yes
- b. No
- c. Maybe? I'm not sure.





Have you read the March 2021 update to OMB A-123 Appendix C (M-21-19).

- a. No, I haven't had the time.
- b. Oh yes, I even have a printed copy!



Polling Question 3

Have you visited PaymentAccuracy.gov before?

- a. Yes
- b. No



Polling Question 4

Are the Washington Capitals going to win their game against Tampa Bay Lightning tonight?

- a. Of course!
- b. Not a chance!
- c. Wait, there's a Caps game tonight?