



DEPARTMENT OF HEALTH AND HUMAN SERVICES  
OFFICE OF AUDIT SERVICES  
233 NORTH MICHIGAN AVENUE  
CHICAGO, ILLINOIS 60601

REGION V  
OFFICE OF  
INSPECTOR GENERAL

June 4, 2009

Report Number: A-05-08-00089

Mr. Barry S. Maram  
Director  
Illinois Department of Healthcare and Family Services  
201 South Grand Avenue East  
Springfield, Illinois 62763-0001

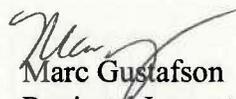
Dear Mr. Maram:

Enclosed is the U.S. Department of Health and Human Services (HHS), Office of Inspector General (OIG), final report entitled "Review of Medicaid Credit Balances at St. Joseph Hospital as of June 30, 2007." We will forward a copy of this report to the HHS action official noted below.

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, OIG reports generally are made available to the public to the extent that information in the report is not subject to exemptions in the Act. Accordingly, this report will be posted on the Internet at <http://oig.hhs.gov>.

If you have any questions or comments about this report, please direct them to the HHS action official. Please refer to report number A-05-08-00089 in all correspondence.

Sincerely,

  
Marc Gustafson  
Regional Inspector General  
for Audit Services

Enclosure

**HHS Action Official:**

Jackie Garner  
Consortium Administrator  
Consortium for Medicaid and Children's Health Operations  
Centers for Medicare & Medicaid Services  
233 North Michigan Avenue, Suite 600  
Chicago, Illinois 60601

Department of Health and Human Services

**OFFICE OF  
INSPECTOR GENERAL**

**REVIEW OF MEDICAID  
CREDIT BALANCES AT  
ST. JOSEPH HOSPITAL AS  
OF JUNE 30, 2007**



Daniel R. Levinson  
Inspector General

June 2009  
A-05-08-00089

# ***Office of Inspector General***

<http://oig.hhs.gov>

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The mission of the Office of Inspector General (OIG), as mandated by Public Law 95-452, as amended, is to protect the integrity of the Department of Health and Human Services (HHS) programs, as well as the health and welfare of beneficiaries served by those programs. This statutory mission is carried out through a nationwide network of audits, investigations, and inspections conducted by the following operating components:

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The Office of Audit Services (OAS) provides auditing services for HHS, either by conducting audits with its own audit resources or by overseeing audit work done by others. Audits examine the performance of HHS programs and/or its grantees and contractors in carrying out their respective responsibilities and are intended to provide independent assessments of HHS programs and operations. These assessments help reduce waste, abuse, and mismanagement and promote economy and efficiency throughout HHS.

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The Office of Evaluation and Inspections (OEI) conducts national evaluations to provide HHS, Congress, and the public with timely, useful, and reliable information on significant issues. These evaluations focus on preventing fraud, waste, or abuse and promoting economy, efficiency, and effectiveness of departmental programs. To promote impact, OEI reports also present practical recommendations for improving program operations.

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The Office of Investigations (OI) conducts criminal, civil, and administrative investigations of fraud and misconduct related to HHS programs, operations, and beneficiaries. With investigators working in all 50 States and the District of Columbia, OI utilizes its resources by actively coordinating with the Department of Justice and other Federal, State, and local law enforcement authorities. The investigative efforts of OI often lead to criminal convictions, administrative sanctions, and/or civil monetary penalties.

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The Office of Counsel to the Inspector General (OCIG) provides general legal services to OIG, rendering advice and opinions on HHS programs and operations and providing all legal support for OIG's internal operations. OCIG represents OIG in all civil and administrative fraud and abuse cases involving HHS programs, including False Claims Act, program exclusion, and civil monetary penalty cases. In connection with these cases, OCIG also negotiates and monitors corporate integrity agreements. OCIG renders advisory opinions, issues compliance program guidance, publishes fraud alerts, and provides other guidance to the health care industry concerning the anti-kickback statute and other OIG enforcement authorities.

# *Notices*

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**THIS REPORT IS AVAILABLE TO THE PUBLIC**  
at <http://oig.hhs.gov>

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, Office of Inspector General reports generally are made available to the public to the extent that information in the report is not subject to exemptions in the Act.

## **OFFICE OF AUDIT SERVICES FINDINGS AND OPINIONS**

The designation of financial or management practices as questionable, a recommendation for the disallowance of costs incurred or claimed, and any other conclusions and recommendations in this report represent the findings and opinions of OAS. Authorized officials of the HHS operating divisions will make final determination on these matters.

## **EXECUTIVE SUMMARY**

### **BACKGROUND**

Pursuant to Title XIX of the Social Security Act (the Act), the Medicaid program provides medical assistance to low-income individuals and individuals with disabilities. The Federal and State Governments jointly fund and administer the Medicaid program. At the Federal level, the Centers for Medicare & Medicaid Services (CMS) administers the program. Each State administers its Medicaid program in accordance with a CMS-approved State plan. Although the State has considerable flexibility in designing and operating its Medicaid program, it must comply with applicable Federal requirements. The Illinois Department of Healthcare and Family Services (the State agency) is responsible for administering the Illinois Medical Assistance Program (Medicaid).

Credit balances generally occur when the reimbursement that a provider receives for services provided to a Medicaid beneficiary exceeds the charges billed, such as when a provider receives payment for the same service from another third party payer. In such cases, the provider should return the existing overpayment to the Medicaid program, which is the payer of last resort.

Federal regulations at 42 CFR 433 subpart F, "Refunding the Federal Share of Overpayments to Providers," implements section 1903(d)(2)(C) and (D) of the Act, requiring States to adjust any outstanding credit balances within 60 days after notification by a provider that a credit balance exists. The State agency does not have any regulations in place requiring providers to refund Medicaid credit balances within a specific time frame.

St. Joseph Hospital (the hospital) is a 30 licensed-bed healthcare facility, located in Chicago, Illinois. The State agency reimbursed the hospital approximately \$24 million for Medicaid services during calendar year 2007.

### **OBJECTIVE**

Our objective was to determine whether the Medicaid credit balances recorded in the hospital's accounting records for inpatient and outpatient services represented overpayments that it should have returned to the Medicaid program.

### **SUMMARY OF RESULTS**

The Medicaid credit balances recorded in the hospital's accounting records for inpatient and outpatient services did not represent overpayments that should be returned to the Medicaid program. As a result, this report contains no recommendations.

## TABLE OF CONTENTS

	<u>Page</u>
<b>INTRODUCTION</b> .....	1
<b>BACKGROUND</b> .....	1
<b>OBJECTIVE, SCOPE, AND METHODOLOGY</b> .....	1
Objective .....	1
Scope.....	1
Methodology .....	2
<b>RESULTS OF AUDIT</b> .....	2

## **INTRODUCTION**

### **BACKGROUND**

Pursuant to Title XIX of the Social Security Act (the Act), the Medicaid program provides medical assistance to low-income individuals and individuals with disabilities. The Federal and State Governments jointly fund and administer the Medicaid program. At the Federal level, the Centers for Medicare & Medicaid Services (CMS) administers the program. Each State administers its Medicaid program in accordance with a CMS-approved State plan. Although the State has considerable flexibility in designing and operating its Medicaid program, it must comply with applicable Federal requirements. The Illinois Department of Healthcare and Family Services (the State agency) is responsible for administering the Illinois Medical Assistance Program (Medicaid).

Credit balances generally occur when the reimbursement that a provider receives for services provided to a Medicaid beneficiary exceeds the charges billed, such as when a provider receives payment for the same service from another third party payer. In such cases, the provider should return the existing overpayment to the Medicaid program, which is the payer of last resort.

Federal regulations at 42 CFR 433 subpart F, "Refunding the Federal Share of Overpayments to Providers," implements section 1903(d)(2)(C) and (D) of the Act, requiring States to adjust any outstanding credit balances. Accordingly, the provider must request an adjustment to the claim or refund the amount to the State agency. Subsequently, the State agency must adjust the applicable claim or recover the amount of the Medicaid overpayment.

St. Joseph Hospital (the hospital) is a 30 licensed-bed healthcare facility, located in Chicago, Illinois. The State agency reimbursed the hospital approximately \$24 million for Medicaid services during calendar year 2007.

### **OBJECTIVE, SCOPE, AND METHODOLOGY**

#### **Objective**

Our objective was to determine whether the Medicaid credit balances recorded in the hospital's accounting records for inpatient and outpatient services represented overpayments that it should have returned to the Medicaid program.

#### **Scope**

As of June 30, 2007, the hospital's accounting records contained 133 credit balance accounts totaling \$67,245 with Medicaid listed as a payer. Our review of credit balances included seven outpatient accounts totaling \$18,251 and four inpatient accounts totaling \$34,000. We limited our review of internal controls to obtaining an understanding of the policies and procedures used by the hospital to review credit balances and report overpayments to the Medicaid program and

did not review its entire internal control structure. This understanding was for the purpose of accomplishing our objective and not to provide assurance of the internal control structure.

We performed fieldwork from August through October 2008 at St. Mary of Nazareth hospital located in Chicago, Illinois, where St. Joseph hospital maintained its accounting records.

### **Methodology**

To accomplish our objective, we:

- reviewed Federal and State requirements pertaining to Medicaid credit balances;
- identified and reconciled the hospital Medicaid credit balances to its accounting records as of June 30, 2007;
- reconciled the hospital's June 30, 2007 credit balance list to the accounts receivable records and reconciled the accounts receivable records to the trial balance; and
- reviewed patient payment data, Medicaid claim forms and remittance advices, patient accounts receivable detail and additional supporting documentation for each credit balance account.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

### **RESULTS OF AUDIT**

The Medicaid credit balances recorded in the hospital's accounting records for inpatient and outpatient services did not represent overpayments that should be returned to the Medicaid program. As a result, this report contains no recommendations.