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### Medicaid Compliance Best Practices

In conducting Effectiveness Reviews of Medicaid providers' compliance programs, the Office of the Medicaid Inspector General ([OMIG](#)) has begun noting and publishing best practices that it identifies. OMIG says that it intends to not only foster compliance with statutory requirements under Social Services Law § 363-d and 18 NYCRR § 521.3-d, but also encourage providers to achieve "innovation and improvement" in doing so. Some of OMIG's suggested best practices include:

- A published code of conduct and/or compliance plan document made available to employees and possibly the general public online.
- The provider's governing board and senior management having meaningful oversight of compliance, and the provider's compliance personnel reporting directly to its senior management.
- Electronic-based compliance training for employees carefully tailored to the requirements of their specific duties, plus effective means of tracking employees' progress and addressing any problems identified.
- A transparent compliance program and encouragement for employees to report problems, whether their own or of colleagues, as a positive indicator of employee performance. Being able to effectively provide anonymity and investigate possible intimidation or retaliation against whistle-blowers is especially helpful.
- Use of employee exit interviews to obtain compliance feedback.
- Use of a comprehensive self-assessment tool to prepare annual compliance work plans for improvements to identified risks or problems with Medicaid-funded services [whether found through internal efforts or as a result of a regulatory body's review].

Additional best practices as determined by OMIG can be reviewed [here](#).

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