



---

**Kevin Corbett** | Chief Executive Officer

**J. Kevin Stitt** | Governor

OHCA 2021-14

Dec. 02, 2021

**Re: Self-Disclosure of Errors and Overpayments**

Dear Provider,

This letter is to inform you of federal policy related to the handling of errors and overpayments. Public Law 111-148, expected to be codified at 42 U.S.C. Sec. 1320a-7k(d)(2), requires Medicaid contracted providers to have a proficient and time-sensitive process for identifying errors and overpayments. Providers are obligated to report and explain any documentation that includes the Oklahoma Health Care Authority (OHCA) electric claim numbers (ICNs) and repay overpayments within 60 calendar days of identification. Those providers that fail to disclose, explain and repay the overpayment in a timely manner may be subject to liability under the Federal False Claims Acts.

We recognize varying types of improper payments are discovered during a provider's internal overpayment review process. When a provider notes an improper payment, the provider must determine whether the repayment warrants a self-disclosure or whether it would be better handled through administrative billing processes. Either process requires repayment within 60 days of identification.

The OHCA is not interested in fundamentally altering the day-to-day business processes of organizations for minor or insignificant matters. Consequently, the repayment of simple, more routine occurrences of overpayments should continue through typical methods of resolution, which may include voiding or adjusting the amounts of claims.

Each incident must be considered on an individual basis. Factors to consider can include the exact issue, the overpayment amount involved, any patterns or trends the problem may demonstrate within the provider's system, the period of non-compliance, and the circumstances that led to the non-compliance problem. Issues appropriate for disclosure may include, but are not limited to:

- Substantial routine errors
- Systematic errors
- Patterns of errors
- Potential violation of fraud and abuse laws



**ADDRESS**

4345 N. Lincoln Blvd.  
Oklahoma City, OK 73105



**WEBSITES**

[oklahoma.gov/ohca](http://oklahoma.gov/ohca)  
[mysoonerCare.org](http://mysoonerCare.org)



**PHONE**

Admin: 405-522-7300  
Helpline: 800-987-7767



---

**Kevin Corbett** | Chief Executive Officer

**J. Kevin Stitt** | Governor

To assist providers, the OHCA has developed the HCA-47 provider self-disclosure form, available on the website at [oklahoma.gov/ohca/providers/forms](http://oklahoma.gov/ohca/providers/forms). If you have questions regarding the information provided in the letter, please contact Teisha Berry via e-mail at [teisha.berry@okhca.org](mailto:teisha.berry@okhca.org) or by fax at 405-530-3208.

Thank you for the services you provide to our SoonerCare and Insure Oklahoma members.

Sincerely,

Melody Anthony  
Chief Operating Officer/State Medicaid Director



**ADDRESS**

4345 N. Lincoln Blvd.  
Oklahoma City, OK 73105



**WEBSITES**

[oklahoma.gov/ohca](http://oklahoma.gov/ohca)  
[mysoonercares.org](http://mysoonercares.org)



**PHONE**

Admin: 405-522-7300  
Helpline: 800-987-7767