

**AMAZING
THINGS
ARE
HAPPENING
HERE**

**Delivery System Reform Incentive
Payment Program (“DSRIP”)**

**NewYork-Presbyterian Performing
Provider System**

AMAZING
THINGS
ARE
HAPPENING
HERE

Overview of DSRIP Program

What is the Delivery System Reform Incentive Payment Program (“DSRIP”)?

DSRIP is a New York State program whose primary purpose is to fundamentally restructure the health care delivery system by reinvesting in the Medicaid program.

What is DSRIP’s Primary Goal?

DSRIP’s primary goal is to reduce potentially preventable hospital admissions and emergency room visits by 25% over 5 years by coordinating care across patient care settings to promote health and better outcomes, particularly for at-risk populations.

Additional information on the DSRIP program can be found at the New York Department of Health website:
http://www.health.ny.gov/health_care/medicaid/redesign/dsrp/

Performing Provider Systems

Collaboration is essential to the mission and goal of the DSRIP program.

DSRIP requires that local networks be established between various provider types. These networks must create new and innovative projects that focus on:

- (i) system transformation;
- (ii) clinical improvements; and
- (iii) population health improvements.

The collective network is called the *Performing Provider Systems* (“PPS”).

Each provider in the network is referred to as a *Participating Provider*.

New York Presbyterian PPS

NewYork-Presbyterian Hospital (“NYP”) has been designated “Lead” for the NYP Performing Provider System network (“NYP PPS”).

NYP PPS consists of a wide variety of provider/organizational types and services including, but not limited to:

- Hospitals
- Clinics
- Primary Care and other Specialty Providers
- Mental Health and Substance Abuse Providers
- Home Care Services
- Laboratory, Radiology and Rehabilitation Service Providers
- Pharmacies
- Community-Based Organizations

DSRIP – Incentive Payment Program:

DSRIP is an incentive payment program. Payment and financial rewards are dependent upon project implementation and meeting specific quality and performance measures.

Payment for DSRIP project-related activities are based on performance linked to:

- achievement of project milestones (*Pay-for-Performance*);
and
- timely reporting (*Pay-for-Reporting*).

DSRIP Funds Distribution Plan

The NYP PPS Lead is responsible for the distribution of DSRIP funds, in accordance with State criteria and the NYP PPS's Budget and Funds Flow Distribution Plan ("Plan").

The Plan supports achievement of DSRIP goals and successful implementation of NYP PPS projects. All funds will be distributed in accordance with the Plan.

NYP PPS Participating Providers must understand their responsibility regarding accurate and timely reporting of milestones measures; and for achieving the goals of each project, as well as the overall DSRIP initiative.

AMAZING
THINGS
ARE
HAPPENING
HERE

NYP PPS Compliance Program

DSRIP PPS Lead Compliance Program Requirements

DSRIP requires that the PPS Lead have an effective compliance program, in accordance with New York State Social Services Law and New York Code, Rules and Regulations.

The Office of Medicaid Inspector General (“OMIG”) released guidance for PPS Leads regarding DSRIP-related compliance.

Accordingly, NYP PPS Lead has established a PPS Compliance Policy, outlining the DSRIP Compliance obligations of the PPS Lead and its Participating Providers.

See Resources slide, at the end of this presentation, for information on NYS compliance program requirements and OMIG DSRIP compliance program guidance

NYP PPS Lead Compliance Program

As part of its DSRIP Compliance Program obligations, the NYP PPS Lead will:

- provide guidance and resources, as appropriate, to Participating Providers on compliance matters related to DSRIP funds
- report to the NYP PPS Executive Committee on DSRIP-related matters regarding compliance
- inform Participating Providers of their responsibility to provide DSRIP-related compliance training to their staff

NYP PPS Lead Compliance Program – cont'd

- **establish systems for routine identification of compliance risks concerning DSRIP project performance and allocated payments**
- **establish communication methods for reporting DSRIP funds-related concerns**
- **establish systems for responding to compliance issues related to DSRIP funds**

Participating Providers' Compliance Program Obligations

OMIG guidance provides that the PPS Lead is not responsible for Participating Providers' compliance programs; as may be required under NYS Law and Regulations, based on their Medicaid provider status.

As such, all Participating Providers involved in the NYP PPS, subject to NYS mandatory compliance program obligations, must have an effective program in place.

Participating Providers not mandated under NYS to establish a compliance program should consider implementing a program appropriate for their size, complexity, resources and culture.

Participating Providers' Compliance Program Obligations – cont'd

All NYP PPS Participating Providers, irrespective of an existing compliance program, must have or establish:

- systems to ensure DSRIP funds are appropriately obtained and are used in accordance with the approved project plan
- systems to identify and prevent fraud and abuse, specific to discrepancies of DSRIP payments or misuse of DSRIP funds
- staff training on:
 - Participating Provider's role in DSRIP project(s);
 - DSRIP compliance expectations of staff; and
 - how to report any fraud or abuse of DSRIP funds to their Compliance Liaison.

Participating Providers' Compliance Program Obligations – cont'd

Participating Provider's compliance program must have or establish:

- appropriate training or educational resources on Healthcare Fraud and Abuse Laws and Regulations, as required by the Deficit Reduction Act
- policies regarding good faith reporting of compliance issues and non-retaliation

In addition to staff obligation to comply with all laws and regulation applicable to the Participating Provider, staff involved in DSRIP projects must be made aware of their obligation to comply with DSRIP regulations and the NYP PPS Lead Compliance Policy provisions.

Compliance concerns related to DSRIP funds may be reported to the PPS Lead via the PPS Help Line at (888)308-4435.

See Resources slide, at the end of this presentation, for information on provider obligations regarding Fraud and Abuse, under the Federal Deficit Reduction Act

Resources

The links below provide additional guidance on Provider Compliance Program requirements.

[**New York Social Service Law 363-d Provider Compliance Program**](#)

[**18 N.Y.C.R.R PART 521.3 - Provider Compliance Programs**](#)

[**Office of Medicaid Inspector General DSRIP Compliance Guidance**](#)

[**Federal Deficit Reduction Act - Fraud, Waste and Abuse**](#)