



OFFICE OF INSPECTOR GENERAL

TEXAS HEALTH & HUMAN SERVICES COMMISSION

STUART W. BOWEN, JR.
INSPECTOR GENERAL

October 22, 2015

Planned Parenthood Gulf Coast
4600 Gulf Freeway
Houston, Texas 77023-3548

Request for Client Records - Planned Parenthood Gulf Coast

Dear Custodian of Records:

The Texas Health and Human Services Commission (Commission), Office of Inspector General (OIG), Inspections and Evaluations Division is conducting an inspection related to certain claims paid by the Medicaid program and filed by or on behalf of Planned Parenthood Gulf Coast.

As provided by section 531.102 of the Texas Government Code, OIG is authorized to evaluate the need for, the quality and the timeliness of all Medicaid services. OIG ensures compliance with all Medicaid statutes, rules, regulations, policies and procedures on the behalf of the Commission. We have selected for inspection services billed under your provider number(s) to the Medicaid program. This letter is a request for records pursuant to 1 Texas Administrative Code (TAC) § 371.1667. Consistent with the requirements of 42 CFR § 431.107(b)(1) and (2), you entered into a provider agreement with the Medicaid program under which you agreed to both retain and make records available as requested by the single state Medicaid agency. This requirement to retain records, and to produce the records upon request, is also included in the October 2015 Texas Medicaid Provider Procedures Manual at Section 1.6.3 Retention of Records and Access to Records and Premises. Section 1.6.3 of the Manual requires that "[r]equested records must be provided promptly and at no cost to the state."

For dates of service from **November 1, 2010 through September 30, 2015**, please provide a complete copy of the entire original client record for each of the clients who are named on the attached list. The attached records request list is made a part of and is incorporated by reference into this request. Once you have made a complete copy of the entire original client record (please **do not** use staples or paper clips on the copies), you must place each copied client record

into a labeled manila folder. OIG will provide you with manila folders and pre-printed labels for your convenience.

If the records are available in electronic searchable format, please provide the records in that format and on encrypted password protected CD disc(s), USB flash drive(s), or an external hard drive. The passwords must be sent by secured email to David.Holmgren@hhsc.state.tx.us In this e-mail, please make sure to also include the name of any software needed to access the records and the software manufacturer's contact information.

Please note the copies of the client records must be complete, exact duplicates of the original records as they exist at the time you are notified of this request. Please also note that, while OIG is presently requesting medical records only relating to the clients on the attached list, OIG may expand this request to include additional clients within these same dates of service at a later time. Therefore, pursuant to the requirements of the October 2015 Texas Medicaid Provider Procedures Manual at Section 1.6.3 (titled "Retention of Records and Access to Records and Premises") you are notified of your continuing obligation to retain all records for any client with dates of service between November 1, 2010 through September 30, 2015 until all audit questions, appeal hearings, inspections, or court cases are resolved.

The responsive client records being sought must include all documents held by Planned Parenthood Gulf Coast that relate to items or services this entity has billed to the Medicaid Program. The client records must include all documentation to support that the services billed to Medicaid were medically necessary, provided in a quality manner and billed appropriately. Accordingly, the client records that are responsive to this request include, but are not limited to, the following:

- physician orders;
- progress notes;
- personal clinical notes;
- nurses' notes;
- procedure reports;
- laboratory and/or diagnostic testing and results;
- radiology testing and results/interpretations;
- charts;
- graphs;
- super-bills; and
- any other document(s) made by or on behalf of Planned Parenthood Gulf Coast, as part of normal business practices for each of the clients for the dates specified, and that support or document the services billed to the Medicaid program by or on behalf of Planned Parenthood Gulf Coast.

For the same period of time, please provide the following business records:

- a complete roster of all owners and employees (current and former), their credentials, job titles, functions/duties, dates of hire and/or termination, professional license numbers (if applicable), home address, home phone number, salary, and any bonuses or incentives any owner or employee received for the same time period noted above;
- a copy of all contractual agreements, including the names, addresses and phone numbers of individuals, subcontractors or business entities that perform billing services, laboratory testing, or any diagnostic testing that produces interpretations or visual results, or that electronically transmits patient health information;
- a signature sheet for any person providing services to clients at a facility owned or operated by one of the above entities during the time period noted above;
- copies of your patient appointment books, schedules, and patient sign in sheets for the time period noted above;
- documentation which demonstrates financial ownership of Planned Parenthood Gulf Coast for the time period noted above;
- copies of all contracts of sale for Planned Parenthood Gulf Coast (specifically, a signed agreement that includes the identification of both previous and current owners), if applicable; and
- at my discretion, any additional documentation that is requested verbally while you are in the process of complying with this written request.

In accordance with 1 TAC § 371.1667, OIG may impose sanctions if you fail or refuse to provide the documents that are responsive to this request. Possible sanction actions include vendor hold and exclusion from participation as a provider in the Texas Medicaid and other federally-funded health care programs until the matter is resolved. In the event of any such sanction action, separate notice will be provided as required by the cited authorities.

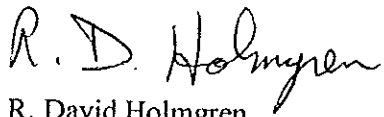
The copies of all documents being turned over to me must be accompanied by a completed and notarized Records Affidavit. I will assist you with the completion of this affidavit. Additionally, for your protection you will sign an Evidence Receipt(s) that describes in detail the items that you are providing to me.

Absent a subsequent written agreement between OIG and Planned Parenthood Gulf Coast that states otherwise, the deadline for providing the requested client records and business documents is **Friday, October 23, 2015 at 10:00 a.m.** This deadline also applies to any additional records and/or documentation I request verbally and deem necessary to assist in this inspection.

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Please contact the undersigned in the event of any questions or concerns. Your assistance is greatly appreciated.

Sincerely,

A handwritten signature in black ink that reads "R. D. Holmgren". The signature is written in a cursive style with a large, looped "H" and a distinct "D".

R. David Holmgren
Deputy Inspector General for
Inspections and Evaluations
Office of Inspector General
Telephone: 512-491-4000

Attachment