PROGRAM INTEGRITY SYSTEMS

Whenever possible, virtual healthcare services should be held to the same program integrity controls as in-person service. Omada's systematic controls ensure that any claim filed for payment – with CMS, or any of our clients – can be audited to provide a comprehensive portrait of an individual's participation with the Omada program. Below, we outline some of the mechanisms in place to ensure that, at every stage of the program, Omada can verify data collection and accuracy. Each of these controls are utilized to protect program integrity.

Enrollment

- Screen for duplicate applications based on ID and email
- Confirm and log
 applicant's coverage
- Ship scale to eligible enrollee's address as uniform source of weight data
- Establish enrollee file to record qualifications for all eligibility criteria

Engagement

- Build comprehensive
 participant profile
 by logging continual
 engagement points
- Record time-stamped
 lesson start, progression
 or interaction, and
 completion
- Record time-stamped
 log-ins, weigh-ins, meals, and messaging with group and coach
- Control app access with a password

Outcomes

- Issue calibrated scale to each participant so all weights are measured accurately and uniformly
- Use web-linked scale to prevent error and bias in self-reporting or manual entry
- Pre-assign scale to participant's ID to accurately attribute all weigh-ins
- Log frequent weight data from home scale to build true picture of progress
- **Require confirmation** from participant of baseline weight and provide continuous visibility to all weights

Billing

- Auto-verify bills are submitted only once for each milestone per participant
- Auto-transfer data from participant's app to the billing system with accuracy verification and no manual entry
- Run reconciliation checks
 between billing data and
 program data
- Control access to billing system and maintain record of individuals with billing system access at all times
- Utilize modifiers on claims to indicate specific milestone