

The Importance of Automating Your Monitoring and Auditing

Megan Grifa, CHC
Director, Medicare Compliance
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- Largest and oldest Health Insurer in Ohio
- Regional MAPD Plan
- New Plan effective 1/1/2016
- Novation 1/1/2017
- Contract Consolidation 1/1/2018
- Regional; 80 of 88 counties in Ohio
- Two H contracts
- 1 HMO, 1 PPO, and EGWP Plans
- Approx. 30k members
- 2017 Program Audit



Requirement

- MMCM Chapter 21, section 50.6

42 C.F.R. §§ 422.503(b)(4)(vi)(E), 423.504(b)(4)(vi)(E)

Sponsors must establish and implement an effective system for routine monitoring and identification of compliance risks. The system should include internal monitoring and audits and, as appropriate, external audits, to evaluate the sponsor's, including FDRs', compliance with CMS requirements and the overall effectiveness of the compliance program.

- MMCM Chapter 21, section 40

42 C.F.R. §§ 422.503(b)(4)(vi), 422.504(i), 423.504(b)(4)(vi), 423.505(i)

The sponsor's compliance officer, working with the sponsor's compliance committee, must develop procedures to promote and ensure that all FDRs are in compliance with all applicable laws, rules and regulations with respect to Medicare Parts C and D delegated responsibilities. The sponsor must have a system in place to monitor FDRs. Sponsors are free to choose the method for monitoring their FDRs' compliance with Medicare program requirements. Sponsors must be able to demonstrate that their method of monitoring is effective. It is a best practice to use metrics to assist in observing compliance performance and operational trends.

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What to monitor/audit?

MMCM Chapter 21:

- Regulatory Requirements
- Sub-regulatory guidance
- Contractual Agreements
- Federal and State Laws
- Internal Policies and Procedures
- FWA

Medical Mutual:

- 28 internal MA/PD operational areas
- 40+ FDRs



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How do you monitor or audit?

- ✓ **Medicare Compliance Annual Audit Work Plan**
 - Risk based audits
 - Desk and/or onsite audits
 - Scheduled and ad hoc
 - Annual FDR Attestations and Audit
- ✓ **Medicare Compliance Monitoring**
 - Quarterly dashboard of key metrics (timeliness, OIG/GSA, Call Center, etc.)
 - Monitor timely completion of compliance training
 - Oversee monitoring activity
 - Incident management timeliness
 - HPMS Memo responses
- ✓ **Operational areas' monitoring and auditing activity**
- ✓ **Procurement** (Monitor contractual SLAs)
- ✓ **FWA activity**

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Risks & Challenges of Manual Activity

Resources

- **Number of Resources**

- ✓ Compliance
- ✓ Operational
- ✓ FDRs
- ✓ Consultants

- **Talent and/or Experience**

- **Level of Efficiency**

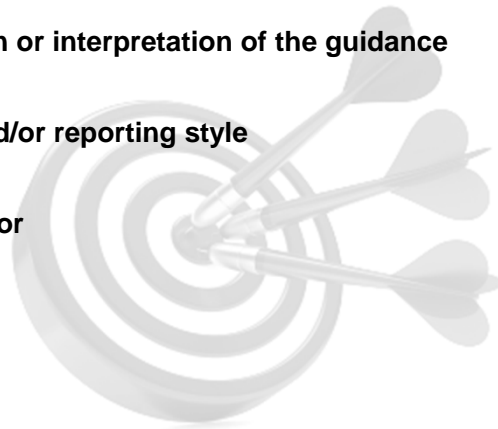
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Consistency/Accuracy

- **Application or interpretation of the guidance**

- **Review and/or reporting style**

- **Human error**



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Timeliness

- **Audit timelines**
- **Frequency**
- **Reaction time**
 - New risks
 - CMS changes
 - Substantiated incidents
 - Validation



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CMS Guidelines

- **CMS focus changes**
- **Frequent updates**
- **Supplemental and sub-regulatory guidance**
- **Interpretations**
- **Communication/Training**



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Data Management

- **Sources**

- Multiple
- Internal and external

- **Formats**

- CPE universes
- Internal reports and trending
- Audit document requests & responses



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Questions?

Megan Grifa
Director, Medicare Compliance
megan.Grifa@medmutual.com