



Building the Plane as
You FLY!

FDR & Vendor
Oversight at a MA
Start-Up



Introductions:



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So, Where to Start ... What are we even Delegating?

- ✦ **Day Negative 100 (-100)**
 - What will be serviced/provided by FTEs?
 - Recruitment, Skills Assessment, Onboarding
 - What will be outsourced?
 - UM, Call Center, Claims, Enrollment, Appeals, Grievances, etc.
 - Who are the candidates for outsourcing?
 - Outreach, Tried and True, Known/Unknown, Contracting
 - Pre-delegation Assessment
 - Offshore concerns, Compliance Effectiveness

****Pro-Tip: Involve Operations Team at Day Zero...and maybe your CEO**

So, Where to Start ... What Are We Even Delegating?



Finding the *Right* Delegate

- Bigger is not always best
 - Most Covered Lives \neq Best in Class
 - Triple Check their Network.
- No Members, 99 Problems
 - Be Prepared for the dreaded, “Its not me, its you...”
 - Vendors can be leery of partnering with 0 MA Members
- Implementation Costs *How Much?!?*
 - Be Prepared to Spend!
 - Trade-in your Personality for Defrayment

Contracting ... Yup, the Boring Part.

Contracts

- Who's Paper We Using?
 - The first dilemma – your template or theirs
 - Easier for you if you use their's, less lawyer work for the vendor
- Service Levels
 - Standard CMS SLA's
 - ASA
 - Hold-Times
 - But let's add a little teeth (\$\$\$)
- Delegated Addendum
 - Be painfully thorough about the roles and responsibilities, this is the area that causes the most heart-burn after Go-Live

DO
NOT
FORGET
THE
MEDICARE
ADVANTAGE
ADDENDUM!!!!

****Pro-Tip: Go to law school so you can do all of the above yourself.**

Implementation

Day 1 to Go-Live, Let's Get Implemented

- **Lead-Time: 7 Months is Good, 8 is Great**
 - Marketing and Actuaries need input early
 - Most Implementations start June 1, shoot for mid-May even if Bids are fluid
 - Q4 should not be when you're pushing things through
- **Meeting Cadence and Inclusion**
 - Meet bi-weekly, then weekly
 - Invite all colleagues to the Kick-Off Meeting, then narrow to specific departments



Implementation

Day 1 to Go-Live, Let's Get Implemented

- **Lie to IT on T-A-T**
 - Eligibility files are due yesterday
 - Claims files were due the day before yesterday
- **Test *all* the Tests**
 - Toll-Free Numbers & Eligibility Files
 - Websites, Compliance Hotline!
 - Networks
- **Website Build-Out**
 - Recommendation – Have a URL Link to their Site rather than loading their networks

*****Pro-Tip: Tell the Vendor to “Just Play the Hits...no new songs”***

Go Live and Hair on Fire!

Put on Them Running Shoes

- **Don't Over-Enjoy Your NYE**
 - An Unhappy Member will be calling 1/1
 - Have Your Support Network Prepped
- **Who Even Owns This Relationship?**
 - Is it you? Is it Sales?
 - A Team-Based Approach may not be best
 - A filtered-through-Compliance might not be ideal for you, but it could aid in:
 - Data Validation Audits
 - 1/3rd Financial Audits
 - CMS Program Audits

****Pro-Tip: Tell the Vendor to “Just Play the Hits...no new songs”**

Speaking of Audits, Are You Audit Ready?

- Even though your Plan is brand new, almost every transaction that is handled internally or from a vendor/FDR from Day One: member call, member communication, provider contract, provider claim, member grievance a/o appeal, pharmacy claim, sales call, enrollment form, etc. is auditable
- As Compliance and Regulatory professionals, we must continuously over-communicate the expectation of constant audit readiness to the Executive and Governance Teams
- Work with your peers and other department to address known compliance issues, especially as they relate to your FDRs or other large vendors. CMS has communicated over and over again, that this an area where much oversight needs to happen

Speaking of Audits, Are You Audit Ready- Part 2?

- After several months have elapsed since Day One, and you have a base number of transactions for a data universe, consider conducting a CMS Mock Audit
- Do NOT wait a year to figure out how well the Plan is complying with CMS administrative, management, and compliance requirements
- You should request monthly data universes from your internal groups and your FDRs to review for systemic issues to address and correct timely
- Any CAPS or fixes put in place now, may positively impact the following year's annual Data Validation Audit (DVA) and potentially the Timeliness Monitoring Project (TMP)

So, What Can Happen if You're NOT Audit-Ready?

- Some Administrative Consequences if government audit goes sub-optimally:
 - Notice of Non Compliance
 - Warning Letter
 - Ad-hoc CAP
 - STAR Ratings Impact
 - Intermediate Sanctions (Marketing, Enrollment)
 - Civil Monetary Penalties (CMP)
 - Termination of Contract

So, What Can Happen if You're NOT Audit-Ready, Part 2?

- Some Financial Consequences to consider if/when it hits the fan:
 - Reputational Embarrassment a/o Harm
 - Hit to Bottom Line (acquiring additional resources, remediation costs, i.e., consultants, etc.)
 - Adverse impact publicly traded companies
 - Hiring of an Independent Auditor

Questions, Comments, Concerns



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