

CMS Managed Care Program Audits

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Speakers



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Panel

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CMS Medicare Part C & D Program Audits UnitedHealthcare MEDICARE & RETIREMENT

- Assess Plan Sponsors compliance with Medicare regulations on a 3 year rolling schedule.
- **Six Program Areas**
 - Compliance Program
 - Formulary & Benefit Administration
 - Coverage Determinations, Appeals & Grievances
 - Organization Determinations, Appeals & Grievances
 - Special Needs Plan – Model of Care
 - Medication Therapy Management (new in 2017)
- **Corrective Action & Enforcement Actions**
 - Immediate Corrective Actions & Corrective Action Plans
 - Civil Money Penalty
 - Sanctions

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Journey & Transformation



- **2011 – 2014**
 - Reactive and responsive
- **2015 – 2016**
 - Movement towards proactive & strategic
- **2017 & beyond**
 - Integrated & innovative

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Audit Readiness Strategy



- **Business Accountability**

- “CMS like” audits
- Reporting and escalating outcomes

- **Resource Management**

- Drive Accountability & Role Clarity
- Compliance & Audit Management collaboration
- Business Program Area Lead (BPAL)
- Prevention, Detection, Corrections (PDC)
- Leverage business processes

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Compliance Program Effectiveness



- “Traces” a compliance issue through the Seven Elements of an Effective Compliance Program
- Four universes:
 - Employees & Compliance Team
 - Internal Audits
 - Internal Monitoring
 - First Tier Auditing & Monitoring
- Opportunity to share our Compliance story with CMS

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End to End Audit Experience



- **On-Site**

- Simplify
- Sampling
- Follow the process!

- **Corrective Action**

- Do not wait for findings

- **Validation**

- Start process to find IAV right away

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Lessons Learned



- **Focus on Sustainability**

- Keep the momentum going after audit closure and expand program to include other ad hoc CMS monitoring and auditing efforts.

- **Regulatory Review Readiness**

- Think beyond the program audit to incorporate other regulatory 'tests' in preparation activities

- **Best Practices**

- Incorporate best practices noted by CMS and others in the industry

- **Maintain Networks**

- Talk with other compliance professionals and learn from their experiences

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Resources



- **Compliance Program Policy and Guidance**
<https://www.cms.gov/Medicare/Compliance-and-Audits/Part-C-and-Part-D-Compliance-and-Audits/ComplianceProgramPolicyandGuidance.html>
- **2017 Medicare Part C and D Program Audit Protocols**
<https://www.cms.gov/Medicare/Compliance-and-Audits/Part-C-and-Part-D-Compliance-and-Audits/ProgramAudits.html>
- **Compliance Program Effectiveness Self Assessment Questionnaire**
<https://www.cms.gov/Medicare/Compliance-and-Audits/Part-C-and-Part-D-Compliance-and-Audits/Downloads/Compliance-Program-Effectiveness-Self-Assessment-Questionnaire.pdf>

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Questions?



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