CMS Managed Care Program Audits

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Speakers

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CMS Medicare Part C & D Program Audits

• 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

Journey & Transformation

• 2011 – 2014
  - Reactive and responsive

• 2015 – 2016
  - Movement towards proactive & strategic

• 2017 & beyond
  - Integrated & innovative
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

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
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

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
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

Questions?

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