



## In the Beginning

---

- 1976 Co-Op Job with SSA
  - learned all about Medicare eligibility and coverage.
- 1980-1998 Worked in Physician Billing Offices at several Teaching Hospital
  - University Hospitals Cleveland, MetroHealth Cleveland, Emory Medical Center
- 1998 hired as Director of Compliance at VUMC
  - Physician At Teaching Hospitals (PATH) Audits
- 2008 Privacy and Compliance Officer at UTMC Memphis
- 2010 MAC Compliance Officer

## About CGS

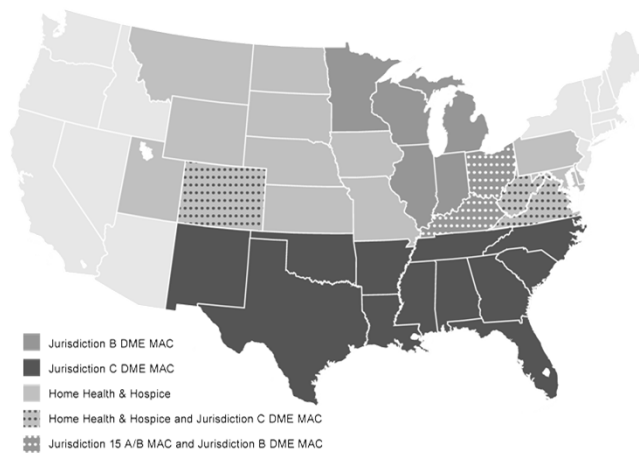
- Owned by BlueCross BlueShield of South Carolina.
- Medicare Administrative Contractor (MAC) for more than 50 years.
- Process claims for 24 million Medicare beneficiaries and 148,000 providers/suppliers in 38 states.
- Administer A/B/HHH and DME Contracts.

3

Confidential, unpublished property of CGS Administrators, LLC. Do not duplicate or distribute. Use and distribution limited solely to authorized personnel. © 2018 Copyright, CGS Administrators, LLC

The Life of a MAC  
**COMPLIANCE OFFICER**

## CGS Jurisdictions



4

Confidential, unpublished property of CGS Administrators, LLC. Do not duplicate or distribute. Use and distribution limited solely to authorized personnel. © 2018 Copyright, CGS Administrators, LLC

The Life of a MAC  
**COMPLIANCE OFFICER**

## Compliance Staffing Model

---

- Compliance & Privacy Officer
- Internal Audit Team
- Process Analyst Team
- Change Management Team
- Administrative Support

5

Confidential, unpublished property of CGS Administrators, LLC. Do not duplicate or distribute. Use and distribution limited solely to authorized personnel. © 2018 Copyright, CGS Administrators, LLC

*The Life of a MAC*  
**COMPLIANCE**  
**OFFICER**

## The Life of a MAC Compliance Officer

---

I traded in my CPT and ICD coding books for the IOM Publication 100-06 Medicare Financial Management Chapter 7, Internal Control Requirements.

<https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/fin106c07.pdf>

6

Confidential, unpublished property of CGS Administrators, LLC. Do not duplicate or distribute. Use and distribution limited solely to authorized personnel. © 2018 Copyright, CGS Administrators, LLC

*The Life of a MAC*  
**COMPLIANCE**  
**OFFICER**

## Monitoring Internal Audits

---

- Internal audits of internal controls
  - Preventive - Training, Workload Management, Edits
  - Detective – Metrics, Audits, QA
  - Directive – Work Instructions, Policies and Procedures

7

Confidential, unpublished property of CGS Administrators, LLC. Do not duplicate or distribute. Use and distribution limited solely to authorized personnel. © 2018 Copyright, CGS Administrators, LLC

*The Life of a MAC*  
**COMPLIANCE**  
**OFFICER**

## Internal Audits

---

- Audits include testing of IOM, SOW and Work Instruction Requirements.
- All Findings require Corrective Action Plan (CAPS) including root cause analysis.
- CAPs are tested by internal audit and require 3 consecutive months of successful testing
- Senior Leadership has Visibility of Findings

8

Confidential, unpublished property of CGS Administrators, LLC. Do not duplicate or distribute. Use and distribution limited solely to authorized personnel. © 2018 Copyright, CGS Administrators, LLC

*The Life of a MAC*  
**COMPLIANCE**  
**OFFICER**

## External Audits

---

- I went from being the auditor to being the auditee.
- CMS Auditors (System Security, QASP, QCP, CFO)
- OIG Audits
- GAO Audits
- External Auditors contracted by CGS to perform required audits
  - SSAE-18, COI

9

Confidential, unpublished property of CGS Administrators, LLC. Do not duplicate or distribute. Use and distribution limited solely to authorized personnel. © 2018 Copyright, CGS Administrators, LLC

The Life of a MAC  
**COMPLIANCE**  
OFFICER

## Risk Assessment

---

- Annual Requirement
- CMS provides directions on ranking into 3 risk factor categories; High, Medium and Low.
- Risk Measurements
  - Reporting Reliance
  - Effectiveness & Efficiency of Operations
  - Management Checks and Balances
  - Staffing Levels, Competence, and Training
  - Documentation and Control Environment
  - Financial Exposure
  - Results of Audits and Known Deficiencies
  - Major Changes in Operations, Systems, Programs, and Controls

10

Confidential, unpublished property of CGS Administrators, LLC. Do not duplicate or distribute. Use and distribution limited solely to authorized personnel. © 2018 Copyright, CGS Administrators, LLC

The Life of a MAC  
**COMPLIANCE**  
OFFICER

## CPIC Certification

---

### Certification of Internal Controls

- 2 x Per Year Compliance Submits a Certification to CMS of Internal Controls.
- Documentation Requirements Described in the Chapter 7 Financial Manual.

11

Confidential, unpublished property of CGS Administrators, LLC. Do not duplicate or distribute. Use and distribution limited solely to authorized personnel. © 2018 Copyright, CGS Administrators, LLC

*The Life of a MAC*  
**COMPLIANCE OFFICER**

## Training

---

- Compliance Training Day 1 - Instructor Led
  - HIPAA Privacy and Security
  - Rules of Behavior
  - Compliance Policies
- Annual Refresher Training Required (Instructor Led and LMS)
- Monthly Scruples Question
- Annual Compliance Culture Survey

12

Confidential, unpublished property of CGS Administrators, LLC. Do not duplicate or distribute. Use and distribution limited solely to authorized personnel. © 2018 Copyright, CGS Administrators, LLC

*The Life of a MAC*  
**COMPLIANCE OFFICER**

## Change Management

---

- All proposed and final Change Requests (CRs/TDLs) are received by compliance.
- Assignments are made to staff to complete required changes.
- Changes must be completed timely.
- Staff required to submit certification and evidence that requirement has been completed.

13

Confidential, unpublished property of CGS Administrators, LLC. Do not duplicate or distribute. Use and distribution limited solely to authorized personnel. © 2018 Copyright, CGS Administrators, LLC

*The Life of a MAC*  
**COMPLIANCE**  
**OFFICER**

## HIPAA

---

- CMS is the Covered Entity (CE) and CGS Business Associate (BA)
- All disclosures are reported to CMS
- 1 Hour to Submit Initial Report
- 40 Days to Submit Final Report

14

Confidential, unpublished property of CGS Administrators, LLC. Do not duplicate or distribute. Use and distribution limited solely to authorized personnel. © 2018 Copyright, CGS Administrators, LLC

*The Life of a MAC*  
**COMPLIANCE**  
**OFFICER**

## Hotline

---

- Managed by External Vendor
  - Hotline Number
  - Web Reporting Ability
- Drop Boxes at Each Location
- Personally Reported

15

Confidential, unpublished property of CGS Administrators, LLC. Do not duplicate or distribute. Use and distribution limited solely to authorized personnel. © 2018 Copyright, CGS Administrators, LLC

*The Life of a MAC*  
**COMPLIANCE**  
**OFFICER**

## Audit Committee of Board

---

- 3-4 External Board Members
  - Charter
  - Calendar of Topics to be addressed at meetings
- In person meeting 3 x per year
  - Audit Reports
  - Compliance Reports
  - PHI Disclosures
- Executive Session
- Remote Call Meetings as needed

16

Confidential, unpublished property of CGS Administrators, LLC. Do not duplicate or distribute. Use and distribution limited solely to authorized personnel. © 2018 Copyright, CGS Administrators, LLC

*The Life of a MAC*  
**COMPLIANCE**  
**OFFICER**



## Conflicts of Interest

---

- All Employees Update COI Annually
- Key Personnel Provide Additional COI Information
- External Auditor Reviews COI Process
- All Contract Proposals Require a COI Analysis
- Staff are not permitted to accept anything of any value from anyone who bills or receives payment from the Medicare or Medicaid Program.

17

Confidential, unpublished property of CGS Administrators, LLC. Do not duplicate or distribute. Use and distribution limited solely to authorized personnel. © 2018 Copyright, CGS Administrators, LLC

The Life of a MAC  
**COMPLIANCE**  
OFFICER

## Resources

---

What To Do If You Find Yourself With Questions You Can't Answer About Medicare?

- Go to the MACs Website
- Call and Speak to a Tier 2 Customer Service Rep
- Contact Your MAC Provider Outreach Department
- Talk With Other Providers. Few Problems are Brand New or Unique

18

Confidential, unpublished property of CGS Administrators, LLC. Do not duplicate or distribute. Use and distribution limited solely to authorized personnel. © 2018 Copyright, CGS Administrators, LLC

The Life of a MAC  
**COMPLIANCE**  
OFFICER

## How to Stay Off the Radar

---

### Outliers Draw Attention

- Volume of Claims, Costs of Services
- Know How You Compare to Peers (CMS Comparative Billing Report CBR)
- Take the CERT Error Rate Seriously. CERT Errors can Draw Unwanted Attention.
- Always Respond to CERT Requests and Respond to all Requests
- Keep in mind, you are responsible for anyone in the claims process. (billing office, providers, ancillary staff)

19

Confidential, unpublished property of CGS Administrators, LLC. Do not duplicate or distribute. Use and distribution limited solely to authorized personnel. © 2018 Copyright, CGS Administrators, LLC

The Life of a MAC  
**COMPLIANCE**  
OFFICER

## CMS Resources

---

- Internet Only Manual Chapter 7
- Medicare Advantage Program Effectiveness Self- Assessment
- HCCA/OIG Assessment

20

Confidential, unpublished property of CGS Administrators, LLC. Do not duplicate or distribute. Use and distribution limited solely to authorized personnel. © 2018 Copyright, CGS Administrators, LLC

The Life of a MAC  
**COMPLIANCE**  
OFFICER

## Closing Remarks

---

- Your Contractor is Obligated to Follow CMS Guidelines and Regulations.
- The Contractor Does Not Make the Rules, we administer as directed by CMS and Congress.
- One of our responsibilities is to protect the Medicare Trust Fund from fraud and abuse.

21

Confidential, unpublished property of CGS Administrators, LLC. Do not duplicate or distribute. Use and distribution limited solely to authorized personnel. © 2018 Copyright, CGS Administrators, LLC

*The Life of a MAC*  
**COMPLIANCE**  
**OFFICER**

## Questions

22

Confidential, unpublished property of CGS Administrators, LLC. Do not duplicate or distribute. Use and distribution limited solely to authorized personnel. © 2018 Copyright, CGS Administrators, LLC

*The Life of a MAC*  
**COMPLIANCE**  
**OFFICER**