

Investing in Your Compliance Program



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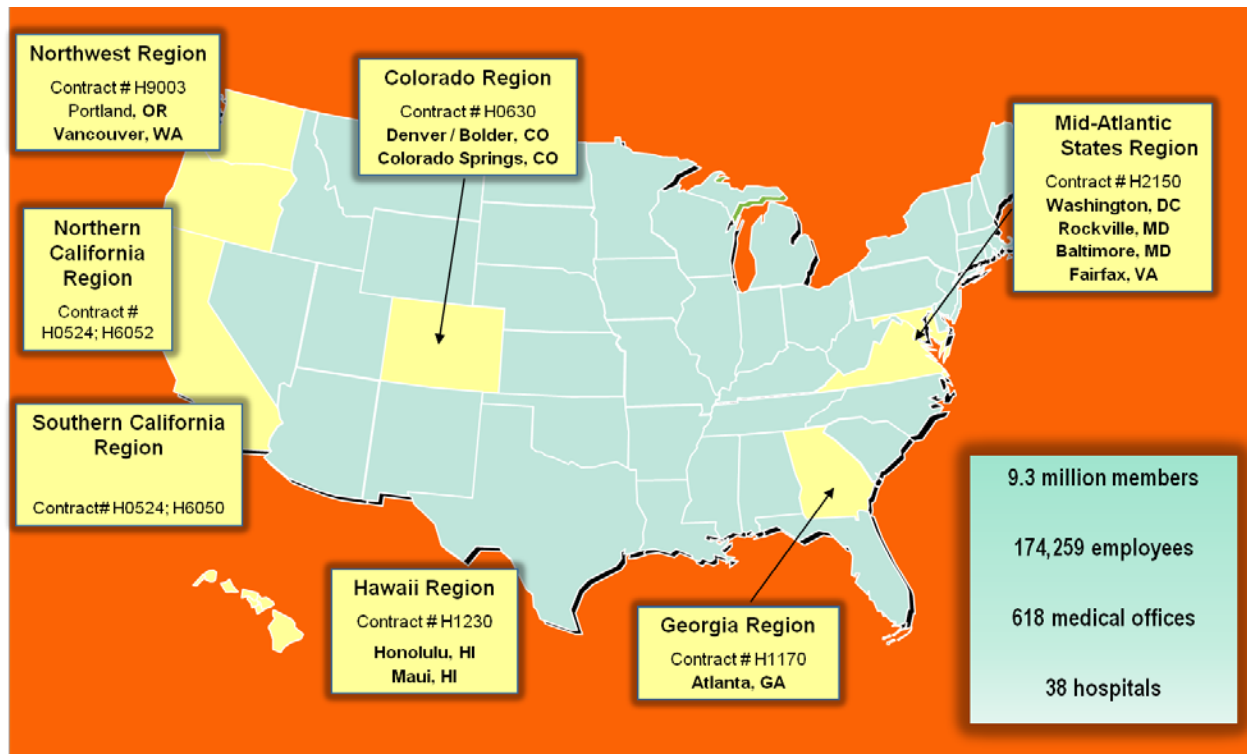
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Kaiser Permanente Overview



Compliance Program Resources

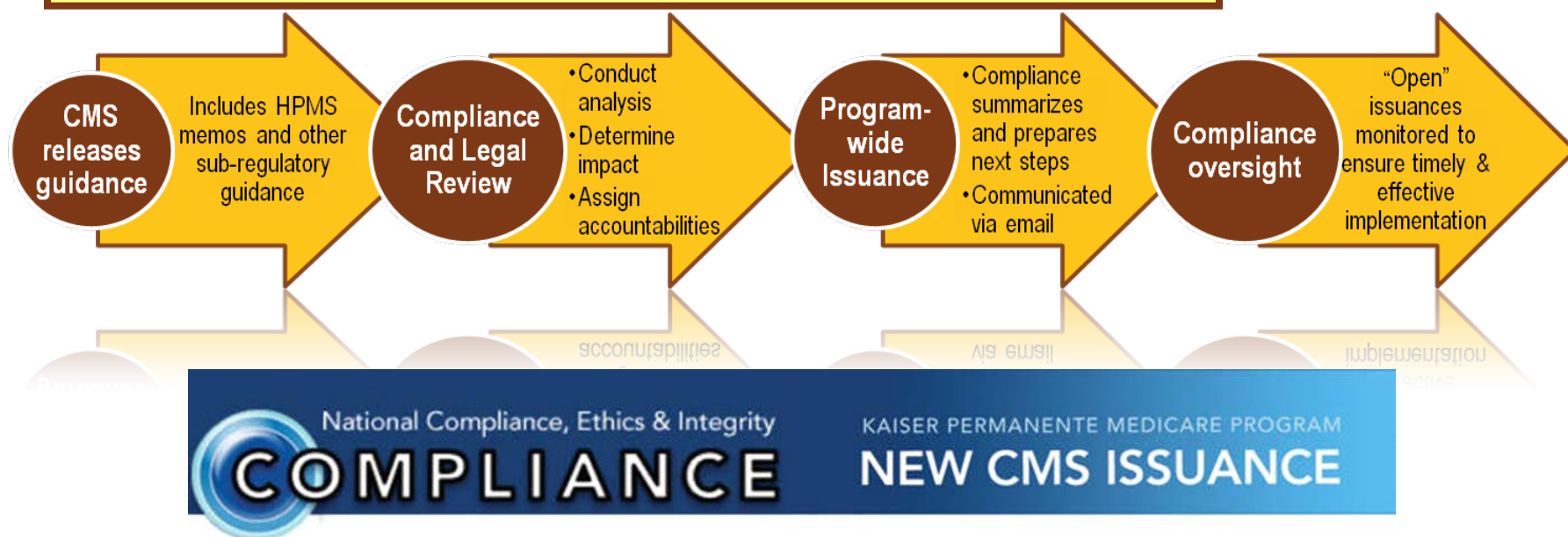
- Kaiser Permanente has a centralized Medicare Compliance function
 - Housed in the National Compliance, Ethics, & Integrity Office (NCO)
 - Strong core team, with a presence in all regions
 - Weekly Medicare Compliance Community of Practice calls

Compliance Program Resources (cont.)

- Ensures consistent, national oversight and high visibility
- Robust and healthy partnership with business is critical to the program's success
 - Representation on key business-led workgroups
 - Close coordination with functional areas and risk management units
 - Participation in discussions with Medicare Leadership Team

Implementation of New Medicare Requirements: New CMS Issuance Process

Medicare Compliance maintains a process for analyzing new guidance, disseminating to applicable stakeholders, and monitoring implementation.



Getting Leadership on Board

- National Health Plan Compliance Committee
- Quarterly Medicare Parts C & D Reports to Board of Directors
 - Chief Compliance Officer reports directly to Board

Getting Leadership on Board (cont.)

- Medicare Monitoring Program
 - Assesses ongoing compliance with operational requirements
 - More than **400** individual metrics across **13** functional area
 - Corrective action plan (CAP) process in place for underperforming measures

Getting Leadership on Board (cont.)

- Medicare Monitoring Program (cont.)
 - Results reported out to Medicare leadership quarterly

Appeals- Part C

Reconsiderations (C-RE)

	CA	CO	GA	HI	MAS	NW
C-RE01 Acceptance of std reconsideration requests	Yes	Yes	Yes	n/a	Yes	Yes
C-RE02 Approp person(s) conduct the reconsid	Yes	Yes	Yes	n/a	Yes	Yes

Appeals – Part C

Reconsiderations - Claims (C-RC)

	CA	CO	GA	HI	MAS	NW
C-RC01 Favorable claims reconsiderations (time)	Yes	Yes	Yes	n/a	Yes	Yes
C-RC02 Adverse claims reconsiderations (time)	Yes	Yes	Yes	n/a	Yes	Yes
C-RC03 Effectuation - third-party reconsid clm rev	Yes	Yes	n/a	n/a	n/a	n/a

Communication with CMS

- Region IX oversight of all Kaiser Permanente contracts
- Bi-weekly calls with CMS Account Management team
 - Inclusion of key operational leads and other staff as needed
 - Detailed minutes
 - Diligent and timely follow-up on action items

Communication with CMS (cont.)

- Centralized tracking of issues discussed with CMS Account Manager
 - Opened/closed logs
 - Updated and submitted monthly
- Transparency and open channels of communication



FDR Oversight

- Program-wide FDR monitoring and auditing program
- Structured on:
 - Partnership between compliance and business functions
 - FDR monitoring and auditing policy and procedures
 - Annual attestation activities
 - Annual risk assessments
 - Annual FDR audit plans

FDR Oversight (cont.)

- Kaiser Permanente's integrated system is immensely beneficial to FDR oversight program
 - Permanente Medical Groups
 - Largest first-tier entities
 - Fully integrated into Kaiser Permanente's compliance program

Compliance Program Best Practices

- Kaiser Permanente passed all eight Compliance Program elements during 2012 Best Practice Review



Compliance Program Best Practices (cont.)

- Numerous best practices cited by CMS
 - Principles of Responsibility (Code of Conduct) “Wiki” Page
 - Compliance Hotline
 - New CMS Issuance Process
 - Data Mining & FWA Claims Monitoring
 - Tracking of FDR Training
 - Use TrakWeb—compliance tracking system of record

