

Investing in Your Compliance Program



Vernisha Robinson-Savoy

Division of Compliance Enforcement

***Medicare Parts C & D Oversight
& Enforcement Group***

June 24, 2014

Agenda

- Topics that will be covered:
 - Why CMS values compliance programs?
 - Frequently asked questions from compliance program effectiveness audits

Agenda (cont.)

- Investing in an effective compliance program: *Compliance Officer's Viewpoint*
 - » Insight from three (3) different Medicare Advantage Organizations and Prescription Drug Sponsors
 - Small- to medium-size, not-for-profit, regional plans
 - Large, integrated care model, not-for-profit, national plans
 - Large, publicly-held, national plans

The Fundamentals of a Medicare Compliance Program



CMS Perspective: The Value of a Compliance Program

- **Operational strategy and business model are linked to compliance program operations.**
- **Successfully manage risks within the organization.**
 - Regulatory and Compliance
 - Financial
 - Operational
 - Reputational

CMS Perspective: The Value of a Compliance Program

- **Measurability**

- Use of tools to manage business decisions and measure performance (ex. Scorecards)
- Outcomes-based Auditing and Monitoring
- Avoid CMS enforcement actions and penalties

- **Detection and Action**

- Communicate with operational areas to work through compliance issues
- Remediate and Execute a Corrective Action Plan
- Identification of fraudulent themes and activities within the organization and marketplace

Frequently Asked Questions from Compliance Program Effectiveness Audits

- What is the “right” organizational/corporate governance structure for an effective compliance program?
- How do Compliance Officers work effectively with limited human and financial resources?
- How does an organization utilize its compliance program to effectively communicate internally and with CMS?

Frequently Asked Questions from Compliance Program Effectiveness Audits

- What are the common challenges experienced across the health care industry with being accountable for and overseeing first-tier, downstream and related entities (FDRs)?
- What are some best practices for educating leadership and business areas on the demands and complexity of the Medicare program as well as responding to compliance issues timely?

Panel Discussion:

Compliance Officer's Viewpoint

- Shannon Trembley, JD, CHPC, Medicare Compliance Officer, Martin's Point Health Care
- Marcella Jordan, VP of Medicare and Compliance Programs, Kaiser Permanente
- Jenny O'Brien, JD, CHC, CHPC, Chief Compliance Officer, United Healthcare