Medicare Advantage & Prescription Drug Oversight & Enforcement

2014 PROGRAM AUDITS • CONFERENCE & WEBCAST

CMS
CENTERS FOR MEDICARE & MEDICAID SERVICES

Tuesday, June 24, 2014
9:30 am – 4:45 pm EDT

CONFERENCE GUIDE

CMS
CENTERS FOR MEDICARE & MEDICAID SERVICES

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CMS DISCLAIMER: This conference or training event is being recorded by the Centers for Medicare & Medicaid Services, U.S. Department of Health & Human Services. By your attendance, you are giving consent to the use and distribution of your name, likeness and voice during the conference or training event. You are also giving consent to the use and distribution of any personally identifiable information that you or others may disclose about you during this event in a legitimate manner that is not intended to cause any harm or undue embarrassment. Images of people attending or participating in the conference or training event may be used and shown within or outside of CMS and may be used for other lawful government purposes and activities. By entering into this conference or training event, you fully consent to the use of your image.

PROGRAM OVERVIEW

The conference will provide insight into how MA and Part D organizations can best prepare for a CMS performance audit. Join CMS experts to learn about best practices of high performing organizations, common findings from audits, and enforcement consequences. All CMS MA and Part D Sponsors are encouraged to attend.

This one day event will be held on **Tuesday, June 24, 2014, from 9:30 AM – 4:45 PM EDT** and will consist of sessions filled with subject matter expert speakers and shared information on the following topics:

- **CMS' Audit Strategy and Data-Driven Approach to Oversight**
- **Program Audits — Best Practices and Common Findings**
- **Mock Audit**
- **How to be Prepared for an Audit**
- **CMS Enforcement Actions**
- **Investing in Your Compliance Program**

AGENDA

7:00 am - 9:30 am	**CHECK-IN/BADGING**
9:30 am - 9:35 am	**Welcome** Stacey Plizga, PRI, Moderator
9:35 am - 9:45 am	**Opening Remarks** Jerry Mulcahy, Director, Medicare Parts C & D Oversight and Enforcement Group (MOEG)
9:45 am - 10:30 am	**CMS' Audit Strategy and Data-Driven Approach to Oversight** Kathleen (Kady) Flannery, Deputy Director, Division of Analysis, Policy, and Strategy, MOEG Q & A Session (10 – 15 minutes)
10:30 am - 11:15 am	**Program Audits — Best Practices and Common Findings** Lorelei Piantedosi, Division of Analysis, Policy, and Strategy, MOEG Q & A Session (10 – 15 minutes)
11:15 am - 12:15 pm	**Mock Audit** Tawanda Holmes, Director, Division of Audit Operations, MOEG Q & A Session (10 – 15 minutes)
12:15 pm - 1:15 pm	**LUNCH BREAK**
1:15 pm - 2:30 pm	**How to Be Prepared for an Audit** Tawanda Holmes, Director, Division of Audit Operations, MOEG Panel with Sponsor Q & A Session (10 – 15 minutes)
2:30 pm - 2:45 pm	**AFTERNOON BREAK**
2:45 pm - 3:45 pm	**CMS Enforcement Actions** Jonathan Blanar, Deputy Director, Division of Compliance Enforcement, MOEG Panel with Sponsor Q & A Session (10 – 15 minutes)
3:45 pm - 4:30 pm	**Investing in Your Compliance Program** Vernisha Robinson-Savoy, Technical Advisor, Division of Compliance Enforcement, MOEG Panel with Sponsor Q & A Session (10 – 15 minutes)
4:30 pm - 4:45 pm	**CLOSING REMARKS**

SESSION SUMMARIES

Opening Remarks

Jerry Mulcahy, *Director, Medicare Parts C & D Oversight and Enforcement Group, CMS*

CMS' Audit Strategy & Data Driven Approach to Oversight

Kathleen (Kady) Flannery, *Pharm D, CGP, Deputy Director, Division of Analysis, Policy and Strategy, Medicare Parts C & D Oversight and Enforcement Group, CMS*

Join CMS for an overview of the risk-based approach they utilize to guide their audit and oversight efforts, including the use and analysis of audit and performance data to guide future audit selection and areas of focus during audits. This will include an overview of the analysis of 2013 audit results, a comparison of 2012-2013 results and an overview of how CMS has changed their approach to risk assessment in 2014.

Program Audits — Best Practices and Common Findings

Lorelei Piantedosi, *Pharm D, CGP, Division of Analysis, Policy and Strategy, Medicare Parts C & D Oversight and Enforcement Group, CMS*

CMS will present the latest results of the Best Practices identified during their 2013 audits. CMS will also provide an overview of the most common performance issues identified in each of the program areas audited in 2013 and discuss the underlying causes of those audit deficiencies in a sponsor's operations.

Mock Audit

Tawanda Holmes, *MA, Director, Division of Audit Operations, Medicare Parts C & D Oversight and Enforcement Group, CMS*

This session will provide the audience an understanding of the 2014 program audit process. CMS will walk through the audit process starting with a content review of the audit start notice, the documentation reviewed during the audit, and the format of the exit conference.

How to Be Prepared for an Audit

Tawanda Holmes, *MA, Director, Division of Audit Operations, Medicare Parts C & D Oversight and Enforcement Group, CMS*

This session will provide the audience with tips to prepare for a CMS 2014 program audit. A sponsor that participated in a 2014 program audit will be presenting their audit preparation strategy.

CMS Enforcement Actions

Jonathan Blanar, *MBA, Deputy Director, Division of Compliance Enforcement, Medicare Parts C & D Oversight and Enforcement Group, CMS*

This session will provide an overview of CMS' enforcement action authority, the types of violations that may result in an enforcement action, and the effect enforcement actions have on organizations. This session will also include a first-hand account from a plan sponsor about what to expect while under sanctions and how to successfully correct the issues of non-compliance to be released from sanctions.

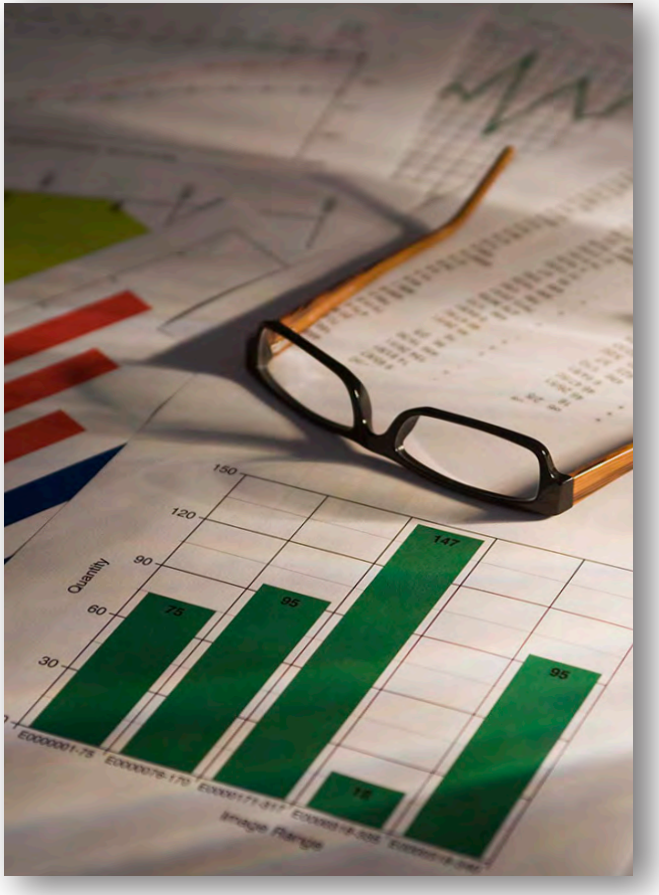
SESSION SUMMARIES

Investing in Your Compliance Program

Vernisha Robinson-Savoy, *MSM, MBA, Technical Advisor, Division of Compliance Enforcement, Medicare Parts C & D Oversight and Enforcement Group, CMS*

This session will discuss the importance and benefits of having an efficient and effective compliance program in your organization. It will include a panel of three plan sponsors that will provide valuable insight into the organization's approach and commitment to operating an effective compliance program. Discussion topics include:

- Trends and Managing Compliance Risks
- Key Partnerships and Resources for Success
- Best Practices for Avoiding and Resolving High-Risk Compliance Issues in the Medicare Parts C and D programs



SPEAKER BIOS

Jerry Mulcahy

Director, Medicare Parts C & D Oversight and Enforcement Group, CMS

Jerry Mulcahy is the Director of the Medicare Parts C and D Oversight and Enforcement Group (MOEG) in the Center for Medicare (CM) at the Centers for Medicare & Medicaid Services (CMS). MOEG is responsible for Medicare Advantage (MA) and Medicare Prescription Drug Benefit (Part D) program compliance, audit and enforcement. Since joining CMS in 2002, Mr. Mulcahy has worked on a variety of high profile health plan initiatives including deeming, marketing, compliance oversight and implementation of the Medicare Modernization Act and Affordable Care Act as well as serving as the Director of the Division of Policy, Analysis and Planning for Medicare Advantage and the Deputy Director of the Medicare Drug and Health Plan Contract Administration Group. Mr. Mulcahy has an extensive background in health care, especially managed care operations and regulatory compliance. Prior to joining CMS, Mr. Mulcahy worked 12 years for Kaiser Permanente in various capacities including Medicare compliance.

Kathleen (Kady) Flannery, PharmD, CGP

Deputy Director, Division of Analysis, Policy and Strategy, Medicare Parts C & D Oversight and Enforcement Group, CMS

Kady Flannery is the Deputy Director of the Division of Analysis, Policy and Strategy, Medicare Parts C and D Oversight and Enforcement Group at CMS in Baltimore, Maryland. She is primarily responsible for the overall development of a comprehensive audit strategy, objectives and measures for overseeing an effective compliance and oversight program for Medicare Advantage (MA) Organizations and Medicare Prescription Drug Plans as well as the development and implementation of policy related to audit, enforcement and compliance program effectiveness for the MA and Part D programs. Kady joined CMS in 2005 and served more than 8 years in the Division of Formulary and Benefit Operations, Medicare Drug Benefit and C& D Data Group as a member of the Formulary Team, as the Benefit Team lead and lastly as the Division's Senior Technical Advisor. Before coming to CMS, Kady was a clinical pharmacist at the Baltimore VA Medical Center where she had earlier completed a clinical residency and fellowship program. She holds a Doctorate of Pharmacy from the University of Maryland, a Bachelor of Science from the University of Maryland, and is a Certified Geriatric Specialist.

Lorelei Piantedosi, PharmD, CGP

Division of Analysis, Policy and Strategy, Medicare Parts C & D Oversight and Enforcement Group, CMS

Lorelei Piantedosi is a Lieutenant Commander (LCDR) with the U.S. Public Health Service and currently works for CMS as a pharmacist for the Division of Analysis, Policy and Strategy in the Medicare Parts C and D Oversight and Enforcement Group (MOEG). LCDR Piantedosi serves as the lead technical advisor for the program audit protocols, workbooks and timeline used to evaluate the Medicare Advantage and Part D programs; and is the lead technical expert for formulary and benefit administration audits. Her previous work at CMS has been with the Pre-Existing Condition Insurance Program, and in the Medicare Drug Benefit and C & D Data Group. Prior to her Federal career, she gained experience in various pharmacy settings, including: community hospital administration; long-term care; managed care; and community pharmacy. She holds a Doctorate of Pharmacy from Creighton University and a Certification in Geriatric Pharmacy.

Tawanda Holmes, MA

Director, Division of Audit Operations, Medicare Parts C & D Oversight and Enforcement Group, CMS

Tawanda Holmes is the Director of the Division of Audit Operations in the Center for Medicare, Medicare Parts C and Part D Oversight and Enforcement Group at CMS in Baltimore, Maryland. She is primarily responsible for directing

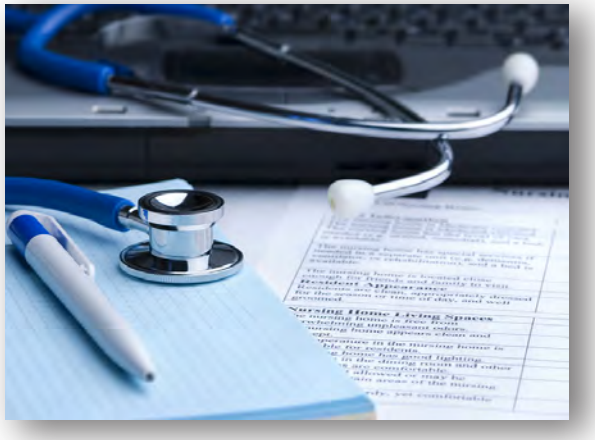
SPEAKER BIOS

all operations to implement the comprehensive audit strategy to oversee all Medicare Advantage and Prescription Drug sponsors. Tawanda has over 15 years of auditing experience. Her experience includes leading a team in conducting the one-third financial audits as well as the cost plan audits with the Office of Financial Management at CMS, conducting Medicare and Medicaid audits with the Office of Inspector General and conducting audits of public utility companies with the Department of Energy. She is a Certified Public Accountant and holds Bachelor of Science in Accounting and Master of Arts degrees.

Jonathan Blanar, MBA

Deputy Director, Division of Compliance Enforcement, Medicare Parts C & D Oversight and Enforcement Group, CMS

Jonathan Blanar is the Deputy Director of the Division of Compliance Enforcement (DCE) in the Medicare Parts C and D Oversight and Enforcement Group at the Centers for Medicare & Medicaid Services. DCE is responsible for developing, maintaining and implementing the Medicare Parts C and D enforcement strategy and directing all operations related to enforcement actions. DCE also serves as the subject matter experts for compliance program policy. Jonathan joined CMS in 2002 and has held various positions, most of them related to audit and



oversight of the Medicare programs. His most recent role was as the Deputy Division Director of the Division of Audit Operations where he focused on developing and implementing a comprehensive audit strategy to assess Medicare Advantage and Prescription Drug sponsors' compliance with regulations and requirements. Prior to joining CMS, Jonathan worked for a private corporation and focused on developing, testing, and implementing an enterprise resource planning (ERP) system. Jonathan holds a Bachelor of Science degree in Business Management and a Master's degree in Business Administration with a concentration in Accounting.

Vernisha Robinson-Savoy, MSM, MBA

Technical Advisor, Division of Compliance Enforcement, Medicare Parts C & D Oversight and Enforcement Group, CMS

Vernisha works as a technical advisor and national lead on the team implementing enforcement and compliance program policy and operational requirements for the Medicare Advantage and Prescription Drug programs. Since joining CMS in 2002, she has held a variety of roles including implementing national strategies to support the agency's regulatory audit and enforcement programs, developing an effectiveness-focused compliance program audit protocol, revising the Medicare Parts C and D Compliance Program Guidelines and as an Account Manager.

Over the past six years, Vernisha has worked directly with many compliance officers and healthcare professionals from a wide range of organizations to identify process improvements and expand self-assessments of their regulatory compliance programs.

Vernisha holds a Bachelor of Science in Health Information Management from Clark-Atlanta University, a Master of Science in Management from Troy University and a Master of Business Administration in Finance and Strategy from New York University – Leonard N. Stern School of Business.

ON-SITE PARTICIPANTS

Housekeeping Rules

- All visitors must be in possession of a valid and current government issued form of photo identification, such as a driver's license, age of majority card, passport or visa; and will be subject to a thorough vehicular inspection.
- Conference attendees must restrict themselves to the first floor Central Building Lobby, Conference Room Center, and Lower Level Lobby/Cafeteria in the Central Building.
  PLEASE NOTE: VISITORS MUST BE ESCORTED BY A CMS EMPLOYEE OUTSIDE OF THE AREAS LISTED ABOVE.
- Food and beverages are not allowed in the Grand Auditorium, so please refrain from bringing items into these areas.
- Smoking is **not permitted** anywhere in the CMS complex. You must go offsite to smoke.
- Telephones and restrooms are located just outside the Pre-function Area on the left before you go back to the Central Building first floor lobby and also across the first floor lobby near the central building security desk.
- The cafeteria is located on the lower level of the Central Building. Lunch will begin at 12:15 pm. There will be an afternoon break at 2:30 pm. Please have your money ready for the cashier when you get in line.

Hotel and Travel Accommodations

SUMMIT VENUE

Centers for Medicare & Medicaid Services
Main Auditorium
7500 Security Boulevard
Baltimore, MD 21244

Baltimore Washington International Airport (BWI) serves as the most convenient airport in the Baltimore, MD area. For additional airport, ground transportation, car rentals, and shuttle information, please click here.

For hotel accommodations, it is recommended that you lodge in downtown Baltimore or near the Baltimore Washington International airport.

ON-SITE PARTICIPANTS

Transportation

AMTRAK

Our city is served by AMTRAK which is located at Pennsylvania Station (Penn Station), five minutes north of the downtown area. The fast moving Metro liner has brought back the grand age of trains between Baltimore, Washington, DC, Philadelphia, and New York. The MARC commuter train operates weekdays along the Baltimore/Washington corridor with two lines that leave from Washington's Union Station and arrives in Baltimore at either Camden or Penn Station.

BWI AIRPORT SHUTTLE AND TAXI SERVICE

Baltimore/Washington International Airport (BWI) is approximately 14 miles away — a 15-30 minute ride to CMS. The taxi fare from the airport vicinity to CMS can vary in price (approximately $20-$30). Also, there are various shuttle services available. You'll need to contact them directly to arrange for this service and confirm their current prices along with the departure/arrival schedules.

If a taxi service is required to and/or from the CMS Main Auditorium, it is recommended that you schedule your taxi service in advance for drop off and/or pick up. For helpful tips while visiting the Baltimore, MD area, please click here.

CAR RENTAL

The majority of car rental agencies listed below service BWI Airport:

- Alamo
- Avis*
- Budget
- Dollar*
- Enterprise*
- Hertz*
- National
- Thrifty*

**Provides vehicles with hand controls for drivers with special needs.*

Directions

SOUTHBOUND

From New York City: I-95 South to I-695 East (Baltimore Beltway) towards Glen Burnie. Follow I-695 to Exit 17 (Security Boulevard – West). Follow Security Boulevard to the end and CMS' main entrance will be located on your right.

From Central Pennsylvania: I-83 South to I-695 East (Baltimore Beltway) towards Glen Burnie. Follow I-695 to Exit 17 (Security Boulevard – West). Follow Security Boulevard to the end and CMS' main entrance will be located on your right.

NORTHBOUND

From Washington, DC: I-95 North to I-695 West (Baltimore Beltway) towards Towson. Follow I-695 to Exit 17 (Security Boulevard – West) toward Rolling Road. Follow Security Boulevard to the end and CMS' main entrance will be located on your right.

From BWI Airport: Baltimore and Washington Parkway (MD-295 to I-695 West (Baltimore Beltway) towards Towson to Exit 17 (Security Boulevard – West) toward Rolling Road. Follow Security Boulevard to the end and CMS' main entrance will be located on your right.

ON-SITE PARTICIPANTS

General Information

CHECK-IN/BADGING

Check-in is located at the CMS Auditorium and is open Tuesday, June 24th, from 7:00 AM until 9:30 AM EDT. All Medicare Advantage & Prescription Drug Oversight & Enforcement Conference attendees and sponsors are required to wear their badges at all times during the event. Badges are not transferable.

CHANGES/CANCELLATIONS

If your organization's representative is unable to attend, please email us at CTEO@cms.hhs.gov immediately so that we can accommodate other participants on-site.

ACCOMMODATIONS FOR PEOPLE WITH SPECIAL NEEDS*

- Assistive listening devices for the hearing impaired
- Captioning services
- Interpreters
- Foreign language services
- Special mobility service for the physically challenged
- Large print or Braille material
- Special access considerations
- Designated areas for wheelchairs and visually impaired

**May be available upon request.*

ATM MACHINE

For your convenience, there is an ATM cash machine on the lower level next to the Credit Union.

MOBILE PHONE USE

Please be courteous to conference speakers and fellow attendees and silence your mobile phones while attending sessions.

FIRST AID INFORMATION

Due to the large size of the facility, be prepared to identify the location of the emergency site. A first aid station is available within CMS. We ask that conference attendees please contact event staff immediately should you require assistance.

SECURITY/EMERGENCY INFORMATION

Building security is available 24 hours a day, 365 days a year and is responsible for the overall protection of the CMS facility, property, visitors, and employees, as well as for providing service and assistance to all patrons.

SMOKING POLICY

CMS is a nonsmoking building. Smoking is prohibited in all areas.

LUNCH SERVICE OPTIONS AT CMS

Order lunch from the CMS cafeteria from your mobile device or online and have it ready and waiting for you in the building! That is right—no need to spend money on gas, just beat the heat and relax at your seat as we prepare your lunch for you! The CMS cafeteria accepts all major credit cards.

PRE-ORDERS DEADLINE DATE: Wednesday, June 18th by 2 pm EDT. On-site conference attendees can pre-order their lunch in advance in order to expedite the process. Pre-orders must be done online (see links below) no later than **2 pm EDT, Wednesday, June 18th**.

You must create an account and password in order to place your order for pickup at 7500 Security Blvd.

- **Catering Made Easy:** https://cms.catertrax.com/shopcatgroup.asp?id=1&intOrderID=&intCustomerID=
- **Simply to Go Catering:** https://cms.catertrax.com/shopcatgroup.asp?id=2&intOrderID=&intCustomerID=

ON-SITE PARTICIPANTS

CHECKLIST In preparation, we encourage you to take a few minutes to review the following:

- **ONLY PRE-AUTHORIZED EVENT ATTENDEES WILL BE ALLOWED ON-SITE**. ***Please arrive at CMS' Headquarters no later than one hour before the start of the event*** in order ensure that all event attendees are able to clear the CMS security procedures and are comfortably prepared to attend the event.

- **Note:** Please provide the CMS Security Guards at the front gate with your first and last name, valid and current photo ID and the nature of your visit (ex: CMS Medicare Advantage & Prescription Drug Oversight & Enforcement Conference event.) Only registered/pre-authorized attendees who's name is on our list will be allowed to enter CMS.

- **Parking:** Visitor parking is available and is indicated by white lines. Do not park between the yellow lines as there is the risk of your vehicle being ticketed and towed.

- **CMS Onsite Security Procedures:** CMS security procedures comprise of a vehicle search, walkthrough scanning device, and X-ray scanning of personal items. **All visitors must provide at least one form of a valid photo ID (ex: drivers license)**; and will be signed in by a member of the CMS Best Practices staff who will escort you to the CMS auditorium.

- **CMS Auditorium:** All visitors will be briefed on the resources and amenities of CMS upon arrival and will have access to the CMS auditorium. The CMS Auditorium is equipped with a live video/audio feed of the webcast.

- **Lunch Service Options at CMS: PRE-ORDERS DEADLINE DATE: Wednesday, June 18th by 2pm EDT. You must create an account and password in order to place your order for pickup at 7500 Security Blvd. Catering Made Easy:** https://cms.catertrax.com/shopcatgroup.asp?id=1&intOrderID=&intCustomerID= or **Simply To Go Catering:** https://cms.catertrax.com/shopcatgroup.asp?id=2&intOrderID=&intCustomerID=

- **Event Materials:** In our efforts to "Go Green", we ask that you download and print event materials (i.e., agenda, presentations, conference guide, etc.) prior to your arrival to the event—click here: http://www.cms.gov/Outreach-and-Education/Training/CTEO/Upcoming_Current_Events.html.

- **Your Points of Contacts:** Should you encounter any difficulties during your travels to CMS Headquarters, please contact us via email at CTEO@cms.hhs.gov.

WEBCAST PARTICIPANTS

Viewing Tips for USTREAM

To learn more information regarding tips for the best viewing experience on "USTREAM," click the link below: https://ustream.zendesk.com/entries/22546906-Tips-for-Best-Viewing-Experience-on-Ustream.

You will be able to obtain information and instructions on how to:

- Watch at a lower quality
- Update browser
- Install and update Adobe Flash
- **Check internet and band width**
- **Check computer resources**
- Disable or enable hardware acceleration
- **Check that USTREAM content is not blocked by an Ad-Blocker, Firewall, or being filtered on your local network**
- Solve the most common problems
- View the event from a Mobile device—most streams on USTREAM are available for viewing on iOS and Android devices

How to Join the Webcast

Please Note: In order to join the live webcast, you must register for this event. Only confirmed registered participants, will be able to access and join the live webcast.

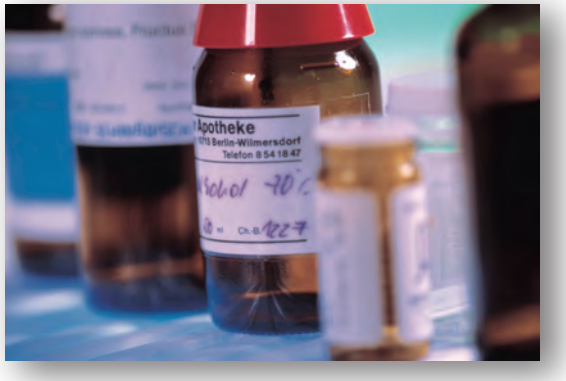
The webcast will be held Tuesday, June 24, 2014, from 9:30 a.m. - 4:45 p.m. EDT. **To facilitate easy access to the webcast, please log in between 9:00 a.m. – 9:30 a.m. EDT on June 24, 2014**. The webcast will begin at 9:30 a.m. EDT.

All participants will be able to see and, using speakers and/or headphones, hear the webcast via their computer. Participants will not be able to participate verbally during the webcast.

Technical Support

CMS will provide a **call-in feature** for this event for use by those attendees who (1) cannot access sound from their computers, or (2) may experience technical difficulties. Attendees should not call the teleconference line unless it is necessary to hear the webcast.

Attendees should report **technical difficulties** by contacting the CTEO Technical Support Team via email at CTEOTechSupport@cms.hhs.gov during the webcast. If you need to utilize the call-in feature, the number will be provided to you at that time.



WEBCAST PARTICIPANTS

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- Report technical difficulties by contacting the CTEO Support via email at CTEOTechSupport@cms.hhs.gov during the webcast. If you need to utilize the call-in feature, the number will be provided to you at that time.

ADDITIONAL RESOURCES

CMS/CTEO Website

To learn more about this event and future events, please visit our website: http://cms.gov/Outreach-and-Education/Training/CTEO/Compliance_Training_Education_and_Outreach.html.

Event Materials

Event materials can be found on our Outreach and Education web page at: http://www.cms.gov/Outreach-and-Education/Training/CTEO/Upcoming_Current_Events.html.

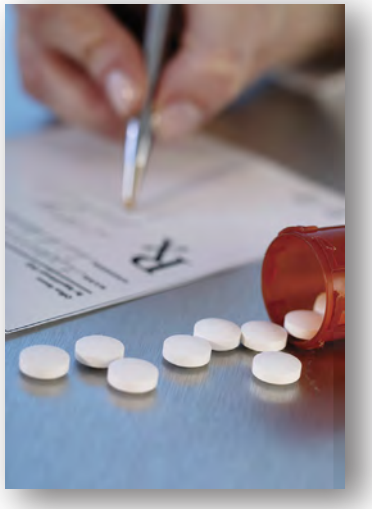
Post Event Online Survey

Please complete your Medicare Advantage & Prescription Drug Oversight & Enforcement Conference & Webcast evaluation survey online at: https://www.surveymonkey.com/s/CMS_2014_MAPD_Oversight_Enforcement

The survey will be available Tuesday, June 24, 2014 through 9 pm EDT Friday, June 27, 2014.

Your Topic/Session Questions for CMS

CMS strongly encourages that organizations submit topic/session questions for this conference in advance of the event to CTEO@cms.hhs.gov. Time will be allotted for some questions and answers for on-site participants during the live webcast. Also, if time permits, presenters may respond to questions received in advance. We ask that you identify the topic/session in your subject line of your email. This will assist us with expediting your question to the appropriate staff.



Technical Support

Report ***technical difficulties*** by contacting the CTEO Technical Support Team via email at CTEOTechSupport@cms.hhs.gov during the webcast.

NOTES

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Baltimore, MD 21244