

Improving Operations Through Audits



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Improving Operations Through Audits



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Journey & Transformation

- **2011 – 2014**
 - Reactive and responsive
- **2015 – 2016**
 - Movement towards proactive, strategic, and innovative

Universe Strategy

- **Two-Day Summit**
 - Facilitated meeting with business partners & IT
 - Reviewed new universe templates and assigned ownership & accountability
- **Business Partner Audit Liaison (BPALs)**
 - Obtain specific contacts in business teams to partner with Compliance & Audit Management
- **SIMPLIFY!**
 - CMS Mailbox (ask questions!)
 - Industry Conferences (HCCA, CMS)
 - CMS Audit Results & Enforcement Action Websites
 - Use all tools available

First Tier, Downstream & Related Entities (FDRs)

- **Delegates**
 - Include ALL impacted delegates from the beginning
- **Oversight**
 - Assist in building delegates and/or internal oversight teams
- **Business Accountability**
 - Business ownership to detect & correct issues within FDRs
- **Test, Test, Test!**
 - Initial mock review in 2015 identified opportunities
 - Early 2016 momentum shifted...improved results
 - Sustainable, repeatable process

Business Accountability

- **Conduct “CMS Like” Audits**
 - Incorporate into monthly monitoring plan
 - Escalate immediately to Senior Leadership & CEO risks in adhering to audit protocols
 - Incorporate audit elements into Key Compliance Indicators (KCI); Compliance Oversight Committee focus
- **Reporting & Escalating Outcomes**
 - Business Leaders present results to Executives, Compliance supports
 - Leadership owns deficiencies and action plan to improve compliance
 - Business teams involved in daily activity to support Senior Leadership reporting to Executives

Example Report

Overall [ORGANIZATION NAME]		-	Improved / Increase from previous dashboard: X.XX (2014 Industry average 1.61) (PPM assessed 1 point if above 2.37)			
Part D Formulary & Benefit Administration						
Executive Owner:		Compliance Officer:				
Audit Elements	Universe Readiness	ICAR	CAR	OBSV	Total	Current Risk Areas
Formulary Administration		-	-	-	-	[Input details on issues identified]
Transition Benefit		-	-	-	-	[Input details on issues identified]
Part D Website		-	-	-	-	[Input details on issues identified]
Part D Formulary & Benefit Administration Potential Audit Score:					-	Improved / Increase from previous dashboard: X.XX (2014 Industry average 1.53)
Part D Coverage Determinations, Appeals & Grievances						
Executive Owner:		Compliance Officer(s):				
Audit Elements	Universe Readiness	ICAR	CAR	OBSV	Total	Current Risk Areas
Coverage Determinations		-	-	-	-	[Input details on issues identified]
Appeals		-	-	-	-	[Input details on issues identified]
Grievances		-	-	-	-	[Input details on issues identified]
Part D Coverage Determinations, Appeals & Grievances, Potential Audit Score:					-	Improved / Increase from previous dashboard: X.XX (2014 Industry average 3.10)
Part C Organization Determinations, Appeals & Grievances						
Executive Owner:		Compliance Officer(s):				
Audit Elements	Universe Readiness	ICAR	CAR	OBSV	Total	Current Risk Areas
Organization Determinations		-	-	-	-	[Input details on issues identified]
Appeals		-	-	-	-	[Input details on issues identified]
Dismissals		-	-	-	-	[Input details on issues identified]
Grievances		-	-	-	-	[Input details on issues identified]
Part C Organization Determinations, Appeals & Grievances Potential Audit Score:					-	Improved / Increase from previous dashboard: X.XX (2014 Industry average 2.78)

Compliance Program Effectiveness

- **Prevention, Detection, & Correction**
 - Restructured Compliance Team
 - Enhanced discipline & role clarity
 - Assess what CMS will expect of Compliance (not only in tracers but overall program audit)
 - Input organizations' ideas into tracer sample
 - CMS' template is an example
 - Incorporated new tracer methodology into issue tracking database
- **FOLLOW THE PROCESS!**

Still More to Learn

- **Focus on Sustainability**
 - Hard work is paying off, but more to do
- **Audit Readiness**
 - Ongoing readiness status for CMS or Regulatory Audit or Ad Hoc Monitoring
- **Best Practices**
 - Incorporating best practices noted by CMS and others in the industry into corrective action plans and/or business improvement plans

Questions?