

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard
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To: Medicare-Medicaid Plans

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Subject: Release of Final CY2017 Program Audit Pilot Protocols for Medicare-Medicaid Plans (MMPs)

The Centers for Medicare & Medicaid Services (CMS) is releasing the final CY2017 Program Audit Protocols for Medicare-Medicaid Plans (MMPs) that will be piloted in conjunction with the existing Medicare Advantage (MA) Program Audit Protocols.

CMS released two draft protocols for MMPs titled Medicare-Medicaid Plan Care Coordination & Quality Improvement Program Effectiveness (CCQIPE) Program Area and Medicare-Medicaid Plan Service Authorization Requests, Appeals and Grievances (SARAG) Program Area for comment on February 23, 2017. These protocols were based on existing Parts C and D Program Audit protocols, but with modifications tailored specifically to MMPs.

CMS received comments from 13 MMPs and MA Plan Sponsors, two associations, one pharmacy benefit manager, and one advocacy group. The commenters supported CMS transparency, suggested revisions to the methodology, and asked CMS to provide additional details where the information was not clear. CMS reviewed and considered all submitted comments, and we incorporated a number of changes to both MMP audit protocols based on this feedback. Attachment A contains a summary of the comments received, categorized by General Comments, CCIQPE, and SARAG, as well as the CMS responses. In addition, during the first year of implementation of the MMP specific protocols, the SARAG and CCQIPE program areas will be conducted as a pilot. During the pilot phase, the conditions of non-compliance will be noted in the draft and final audit reports; however, these findings will not factor into the overall audit score.

Any questions regarding the final release of the CY2017 MMP Program Audit Pilot Protocols should be sent to MMCOCapsModel@cms.hhs.gov and part_c_part_d_audit@cms.hhs.gov.