



## **CMS 2010 BI-REGIONAL MEDICARE HEALTH PLAN COMPLIANCE CONFERENCE**

**Boston & New York – Serving Our Beneficiaries Together**

Verbatim Transcript

CMS Vision for Compliance – Serving Our Beneficiaries Together

James T. Kerr

>> NOW I HAVE THE PRIVILEGE OF INTRODUCING THE CAPTAIN OF THE SHIP. SO FOR THOSE OF YOU WHO WONDER WHO THAT IS, DO YOU KNOW WHO I'M REFERRING TO? JAMES T. KERR. HE'S JAMES T. KERR, HE IS OUR CONSORTIUM ADMINISTRATOR. NOW SOME OF YOU'VE PROBABLY MET JIM. HE'S MADE AN ATTEMPT TO BE IN ALL OF OUR REGIONAL OFFICES. BUT, PERHAPS, SOME OF YOU HAVE NOT. SO YOU HAVE A TREAT IN STORE. JIM KERR IS THE ADMINISTRATOR OF THE CONSORTIUM FOR MEDICARE HEALTH PLANS OPERATIONS AND WE SHORTEN THAT TO CMHPO AT THE CENTERS FOR MEDICARE AND MEDICAID SERVICES. AND HIS OFFICE IS HERE IN NEW YORK. HE SUPERVISES APPROXIMATELY 400 STAFF IN THE 10 REGIONAL OFFICES. SO THAT'S WHY WE CALL HIM THE CAPTAIN OF THE SHIP. BECAUSE THERE ARE 10 REGIONAL OFFICES, 1 CENTRAL OFFICE IN BALTIMORE AND HIS

STAFF, HIS 400 PEOPLE ARE SPREAD FROM NEW YORK AND BOSTON, TO SEATTLE AND SAN FRANCISCO. HE PROVIDES--THE STAFF PROVIDE DAILY OVERSIGHT TO OVER 800 CONTRACTS DELIVERING MEDICARE ADVANTAGE AND PRESCRIPTION DRUGS SERVICES TO MORE THAN 28 MILLION BENEFICIARIES NATIONWIDE. MR. KERR WAS FORMERLY THE CMS REGIONAL ADMINISTRATOR IN THE NEW YORK REGIONAL OFFICE. HE CAME TO CMS IN 2003 WITH MORE THAN 25 YEARS EXPERIENCE IN TOP LEVEL EXECUTIVE POSITIONS IN COMMERCIAL INSURANCE AND IN NEW YORK CITY GOVERNMENT. HE WAS THE VICE PRESIDENT OF GOVERNMENT HEALTH PLANS FOR UNITED HEALTHCARE'S NEW YORK TRI-STATE MARKET WHERE HE LAUNCHED THEIR MANAGED CARE PRODUCT, HAD PROFIT AND LOSS OVERSIGHT FOR UNITED'S MEDICARE AND MEDICAID HMO PRODUCTS AND OPERATIONAL CONTROL FOR OVER--OVER SEVERAL MAJOR PLAN MANAGEMENT FUNCTIONS. HE WAS PREVIOUSLY THE CHIEF OPERATING OFFICER OF SANUS HEALTH PLAN OF NEW YORK AND NEW JERSEY WHICH HAS A HUNDRED THOUSAND MEMBERS AND IS AN INDIVIDUAL PRACTICE ASSOCIATION HMO. MR. KERR HAS A MASTER OF SCIENCE IN MANAGEMENT AND A BA IN MECHANICAL ENGINEERING FROM THE RENSSELAER POLYTECHNIC INSTITUTE. HE ALSO EARNED AN MBA IN HEALTH CARE ADMINISTRATION FROM MOUNT SINAI, BARUCH COLLEGE. HE RECEIVED THE PRESIDENTIAL MERITORIOUS EXECUTIVE RANK AWARD IN OCTOBER OF 2007. PLEASE WELCOME JAMES KERR.

>> THANK YOU. WELL, THAT WAS A SHORTER INTRODUCTION IN SOME WHICH IS A GOOD THING. THERE WAS, AT LEAST, ONE INTRODUCTION THAT I RECALL THAT EVEN SAID WHERE I WAS BORN. SO WE WON'T

GO THAT FAR. I DO WANT TO SAY  
NUMBER ONE, I'M VERY, VERY HAPPY  
TO BE HERE AND I WOULD LIKE TO,  
VERY BRIEFLY, GO THROUGH WHAT  
THE RESPONSIBILITIES ARE FOR  
CMHPO. AGAIN WITH THE BOOK ON  
[INDISTINCT] IT'S EASY TO SAY  
ALL THOSE LETTERS WRITE TOGETHER  
CMHPO AND WHAT OUR  
RESPONSIBILITIES ARE. THE  
BALTIMORE STAFF THAT YOU'RE  
GOING TO HEAR FROM, LATER ON IN  
THE CONFERENCE ARE THE POLICY  
FOLKS SUPPORTS C&D. CMHPO IS  
THE C&D OPERATIONAL ARM OF THE  
AGENCY AND IT'S ORGANIZED AROUND  
THREE KEY AREAS OF  
RESPONSIBILITY. ONE IS HEALTH  
AND DRUG PLAN MONITORING, WE  
SERVICE THE FRONTLINE REGULATORS  
OF HEALTH AND DRUG PLANS THROUGH  
OUR ACCOUNT MANAGEMENT  
RESPONSIBILITIES. THE SECOND  
IS, CASE WORK, ENSURING THAT THE  
PART--C&D CASE WORK IS PROMPTLY  
ADDRESS EITHER DIRECTLY BY CMS  
OR BY THE HEALTH AND DRUG PLANS  
ADHERING TO BENEFICIARY FOCUSED  
CUSTOMER SERVICE PRINCIPLES.  
AND OUTREACH AND EDUCATION,  
HELPING BENEFICIARIES, THEIR  
ADVOCATES, PARTNERS AND ACTIVE  
STAKEHOLDERS UNDERSTAND THE  
MEDICARE PROGRAM AND ITS OPTIONS  
WHILE ALSO PROMOTING NATIONAL  
AGENCY INITIATIVES SUCH AS  
PREVENTION, ELECTRONIC HEALTH  
RECORDS AND SO ON. WE ARE THE  
EYES AND EARS OF THE AGENCY AND  
PROVIDES SITUATIONAL AWARENESS  
FROM ALL OF OUR VARIOUS INTAKE  
POINTS AND FUNNEL IT TO OUR  
LEADERSHIP IN BALTIMORE AND  
WASHINGTON. NOW TODAY'S THEME  
IS SERVING ALL BENEFICIARIES  
TOGETHER AND THAT'S A VERY GOOD  
THEME. WE COULD ALSO SAY THAT  
THE THEME IS MORE IN THAT IN  
SERVING OUR BENEFICIARIES  
TOGETHER WE HAVE TO DO MORE.  
WE'VE HEARD OUR HEALTH AND DRUG

PLANS IN THEIR REQUESTS FOR MORE INFORMATION, MORE ANSWERS TO THEIR QUESTIONS, MORE ACCESS TO CMS SUBJECT MATTER EXPERTS AND SPECIALLY WE HEAR REQUEST FOR MORE PLANS WANTING TO KNOW MORE ABOUT WHAT CMS CONSIDERS IMPORTANT. WITH THAT CONCEPT OF MORE IN MIND OVER THE LAST COUPLE OF YEARS, WE'VE ATTEMPTED TO FACILITATE AND PROVIDE SPEAKERS TO MORE HEALTH AND DRUG PLAN CONFERENCES OUTSIDE THE BALTIMORE BELTWAY. BY HAVING CONFERENCES LIKE THE TRI-REGIONAL CONFERENCE WE HAD LAST MONTH IN DALLAS OR OUR BI-REGIONAL CONFERENCE IN NEW YORK TODAY OR THE ANNUAL ICE CONFERENCE IN SAN FRANCISCO LATE THIS FALL. WE'RE TRYING TO PROVIDE MORE OPPORTUNITIES FOR YOU AND YOUR COLLEAGUES TO BETTER UNDERSTAND PROGRAM ASPECTS AND ACHIEVE A LEVEL OF COMPLIANCE THAT EXCEEDS OUR EXPECTATIONS AND PROVIDES ADDED VALUE TO OUR BENEFICIARIES. THESE CONFERENCES ARE INTENDED TO COMPLIMENT AND REINFORCE THE THEMES OF OUR BALTIMORE CONFERENCES AND GIVE YOU MORE OPPORTUNITIES TO INTERACT WITH US AS AN AGENCY. WITH THAT IN MIND SOME OF THE POINTS YOU'LL BE HEARING TODAY AND OVER THE NEXT FEW DAYS SHOULD NOT BE ENTIRELY NEW TO YOU. HOWEVER, WE FEEL SOME POINTS ARE EXTREMELY IMPORTANT TO MAKE AND MAKE AGAIN. BECAUSE WE HAVE EVIDENCE THAT OUR SHARED OBJECTIVES ARE NOT ALWAYS BEING MET. FROM MY PERSPECTIVE COMPLIANCE NEEDS TO START AT THE TOP OF THE ORGANIZATION AND HAS TO BE INGRAINED IN YOUR COMPANY CULTURE AND EACH OF YOU IN THE ROOM ARE ESSENTIAL TO MAKING THAT HAPPEN. HAVING PLANS AND PROCEDURES IN PLACE THAT

OUTLINED A COMPLIANCE PROGRAM IS A GREAT WAY TO START. BUT THERE'S MUCH MORE TO COMPLIANCE THAN PROCEDURES AND MANUALS. WHILE ALL OF OUR HEALTH AND DRUG PLANS HAVE AFFIRMED THAT THEY HAVE A POLICY MAKING BODY THAT EXERCISES AUTHORITY OVER PLANNED OPERATIONS, SOME HAVE OWNERSHIP AND MANAGEMENT RELATIONSHIPS THAT MAYBE INSUFFICIENT FOR ENSURING COMPLIANCE WITH MEDICARE RULES AND REGULATIONS. WE CONSIDER ORGANIZATIONS SUCH AS THESE WORTHY OF FURTHER EXAMINATION. IN THE COURSE OF THE THREE MONTHS WE'VE LOOKED AT SOME OF THESE ORGANIZATIONAL ARRANGEMENTS MORE CLOSELY AND IT HAS US CONCERNED. WELL, I'M NOT SAYING THAT ANY OF THESE ORGANIZATIONS ARE SUBSTANTIALLY DEFICIENT SUCH MANAGEMENT AND OPERATIONAL RELATIONSHIPS DO RAISE SERIOUS QUESTIONS. SUCH AS WHAT SYSTEMS ARE IN PLACED FOR EMPLOYEES TO BRING POTENTIAL CONFLICTS OF INTEREST TO THE ATTENTION OF THE MEDICARE COMPLIANCE OFFICER? HOW DOES THE ORGANIZATION INSURE RELATIONSHIPS HITS DOWNSTREAM ENTITIES DO NOT VIOLATE ANTI KICK BACK LAWS? HOW OFTEN DOES THE BOARD OF DIRECTORS AND THE COMPLIANCE COMMITTEE MEET. ARE MINUTES TAKEN? AND ARE OPERATIONAL DEFICIENCIES AT THOSE MEETINGS ADDRESSED? YOU'VE HEARD US SAY IT MANY TIMES THAT CMS CONSIDERS COMPLIANCE ESSENTIAL. IT HAS TO BE BECAUSE COMPLIANCE PROVIDES A BASIC PROTECTION FOR OUR BENEFICIARIES AND IT IS OUR JOB AS FEDERAL REGULATORS TO ENSURE THAT PROTECTION. JUST AS YOU'RE HELD ACCOUNTABLE FOR YOUR OWNERS AND SHAREHOLDERS. JUST AS WE HOLD YOU ACCOUNTABLE FOR MEETING ALL OF THE REQUIREMENTS OF YOUR

CONTRACTS. WE ARE HELD ACCOUNTABLE TO THE PRESIDENT, CONGRESS AND THROUGH THEM THE AMERICAN TAXPAYER TO PROTECT MEDICARE BENEFICIARIES. NOW, IF YOU'VE READ THE PAPERS OF THE LAST FEW WEEKS, YOU KNOW THAT WE'VE TAKEN SOME COMPLIANCE ACTIONS. I WANT TO TELL YOU THAT IT'S NOT OUR GOAL TO DENY YOUR APPLICATIONS, LEVY CIVIL MONEY PENALTIES, IMPLEMENT ENROLLMENT, SUSPENSIONS OR WORSE OF ALL, CONDUCT PLANNED TERMINATIONS. THESE ACTIVITIES SHED AN UNFAVORABLE LIGHT ON THE PROGRAM AND WE CONSIDER THAT PROGRAM VERY VALUABLE FOR 29 MILLION MEDICARE BENEFICIARIES. THEY ALSO HAVE THE POTENTIAL TO BE DISRUPTIVE TO OUR BENEFICIARIES. BUT I WANT TO BE CLEAR, MAKE NO MISTAKE ABOUT IT. WE WILL TAKE SUCH ENFORCEMENT ACTIONS QUICKLY TO PROTECT OUR BENEFICIARIES. WE'RE NOW ON THE FIFTH YEAR OF THE MEDICARE PART D PROGRAM AND THEN THE -- WHO KNOWS HOW LONG IT'S BEEN IN THE MEDICARE ADVANTAGE PROGRAM. AND OUR EXPECTATION IS THAT AT THIS POINT PLANS WILL GET IT RIGHT. WE ARE NOT RELUCTANT TO TAKE DRAMATIC STEPS TO PROTECT THE INTEGRITY OF MEDICARE ADVANTAGE IN THE MEDICARE PART D. BUT WHERE WE WANT TO GET TO IS EARLY DETECTION AND TIMELY PLANNED CORRECTION SO WE ACHIEVE COMPLIANCE AND AVOID ENFORCEMENT ACTIONS. LET ME SAY THAT AGAIN BECAUSE IT'S VERY IMPORTANT. WHAT WE WANT TO GET TO IS EARLY DETECTION AND TIMELY PLANNED CORRECTION SO WE ACHIEVE COMPLIANCE AND AVOID ENFORCEMENT ACTIONS. WE WANT PLANS TO BE MORE PROACTIVE SO WE DON'T HAVE TO BE REACTIVE. ACHIEVING COMPLIANCE IS NOT AN EASY TASK AND WE RECOGNIZE THERE WILL BE

TIMES WHEN THINGS WON'T GO RIGHT. THAT'S WHY IT'S IMPORTANT AS AN ORGANIZATION THAT YOU CLOSELY MONITOR YOUR INTERNAL DATA WHETHER IT'S APPEALS DATA, CTM METRICS OR GRIEVANCE STATISTICS, AND DIG DEEP TO IDENTIFY FUNDAMENTAL BREAKDOWNS THAT HAVE THE POTENTIAL TO SIGNIFICANTLY IMPAIR BENEFICIARY ACCESS TO SERVICE. WE'VE HAD PLANS -- TELL US THAT OUR DATA IS WRONG. THEY SPEND A LOT OF TIME TRYING TO FIGURE OUT WHY OUR DATA IS WRONG OR PROVE THAT OUR DATA IS WRONG. THEY NEED TO SPEND THAT TIME FIGURING OUT WHERE THEIR PROBLEMS ARE? AFTER YOU DETERMINE WHAT DO I NEED TO DO IMMEDIATELY TO FIX THE PROBLEM, DISCOVER WHY IT OCCURRED AND WHAT WERE THE ROOT CAUSES SO THAT YOU CAN MAKE SURE IT DOESN'T HAPPEN AGAIN. IT'S ALL ABOUT GETTING TO THE WHY, AND ASSURING THAT THESE PROBLEMS WILL NOT RECUR. IF YOU'RE NOT LEADING YOUR PLAN TO DO THIS ON A ROUTINE BASIS AND MAKING NECESSARY CORRECTIONS, NEITHER YOUR PLAN, NOR YOU AS THE COMPLIANCE OFFICER ON MEETING OUR EXPECTATIONS, BUT THERE IS MORE. WE ALSO EXPECT THAT YOU'LL BE TAKING ACTION THAT WILL PREVENT COMPLIANCE ISSUES. TO DO THIS EFFECTIVELY. COMPLIANCE OFFICERS NEED TO BE WELL VERSED IN THE QUALITY CHECKS NEEDED TO INSURE THEIR PLANS ARE BEING MARKETING APPROPRIATELY AND THAT THE PLAN BENEFITS ARE BEING ADMINISTERED AS DETAILED IN YOUR BID. THEY ALSO NEED TO BE PROACTIVE AND INITIATE ANALYSIS IN AREAS OF HIGH RISK. EVEN BEFORE A PROBLEM SURFACE SUCH AS IN THE LOADING OF LIS INFORMATION INTO PLAN SYSTEMS OR THE

RECONCILIATION OF ENROLMENT TRANSACTIONS. THEY NEED TO BE MINDFUL OF KHPMS MEMORANDA, DUE DATES AND CHANGES IN POLICY. AND LASTLY, THEY NEED TO EXHIBIT A COMMITMENT TO QUALITY. THAT MEANS INSURING YOUR ORGANIZATION CONDUCTS CHECKS AND SOMETIMES RECHECKS TO MAKE SURE THAT THE DATA THAT COMES TO YOUR ORGANIZATION IS PROPERLY HANDLED AND THAT THE DATA THAT LEAVES YOUR ORGANIZATION IS ACCURATE. OVER THE PAST 18 MONTHS CMS HAS BEEN RECEIVING AN INCREASED NUMBER OF SECURITY BREACHES SELF DISCLOSED BY PLANS AND IN SOME CASES BY THE MEDIA. A SIGNIFICANT NUMBER OF THOSE APPEARED TO HAVE OCCURRED DUE TO ERRORS IN YOUR VARIOUS DOWNSTREAM ENTITIES. IN OUR POST HEPA ENVIRONMENT AND WITH IDENTITY THEFT ON THE RISE, IT'S ESSENTIAL THAT YOU TAKE THE NECESSARY STEPS TO SECURE OUR CURRENT AND FORMER MEMBERS PROTECTED INFORMATION. WHEN YOU FAIL TO DO THIS, WE SEE THIS AS AN INDICATION OF POOR OVERSIGHT AND WEAK INTERNAL CONTROLS. AS MORE AND MORE ORGANIZATIONS COME TO RELY ON THIRD PARTY VENDORS, EFFECTIVE INTERNAL CONTROLS ARE ESSENTIAL, WHETHER IT'S YOUR CLAIMS PROCESSING CONTRACTOR OR AN INDIVIDUAL AGENT IN A FIELD MARKETING ORGANIZATION THAT SELLS YOUR PRODUCT. WE AT CMS DO NOT DISTINGUISH BETWEEN YOU, YOUR PBM OR OTHER CONTRACTORS. AN ERROR MADE BY YOUR PBM IS YOUR ERROR. AND SO YOU NEED TO MAKE SURE SUCH ISSUES ARE REPORTED FROM YOUR CONTRACTORS TO YOU. IN THE PAST YEAR, WE HAVE SEEN INSTANCES WHERE PLAN SPONSORS REPORT ISSUES POTENTIALLY CAUSED BY A PBM THAT ARE NOT REPORTED BY OTHER ORGANIZATIONS THAT USE THE SAME



PBM FOR THE SAME FUNCTION. WE'VE FOUND THAT SOME PROBLEMS EFFECT MULTIPLE ACCOUNTS AND SOME PARENT COMPANIES KNOW NOTHING ABOUT IT UNTIL WE TELL THEM. THAT'S COMPLETELY UNACCEPTABLE. IN ADDITION, IN THE LAST SIX MONTHS OR SO WE HAVE SEEN INSTANCES OF PARTY BENEFICIARY ACCESS ISSUES, AND SO I'D LIKE TO DISCUSS A FEW OF THEM IN GREATER DETAIL. NUMBER ONE IS FAILURE TO ADHERE TO CMS IN YOUR OWN CMS APPROVED TRANSITION POLICIES. PLANS ARE EXPECTED TO IMPLEMENT AN EFFECTIVE POLICY DESIGN TO PREVENT ADVERSE CONSEQUENCES RESULTING FROM ENROLLED BENEFICIARIES NOT BEING ABLE TO OBTAIN NEEDED MEDICATION AT THE POINT OF SALE, THIS MEANS WORKING AGGRESSIVELY TO EFFECTUATE A MEANINGFUL TRANSITION. THE NEW ENROLLEES, BENEFICIARIES AND LONG TERM CARE FACILITIES AND CURRENT ENROLLEES AFFECTED BY FORMULARY CHANGES ONE YEAR TO THE NEXT. NUMBER TWO, INAPPROPRIATE PRIOR AUTHORIZATION OR STEP THERAPY REQUIREMENTS. AS YOU KNOW, PA AND STEP THERAPY REQUIREMENTS CANNOT BE IMPLEMENTED TO STEER BENEFICIARIES TO PREFER ALTERNATIVES. NUMBER THREE, USE OF UNAPPROVED UTILIZATION MANAGEMENT EDITS AND FAILURE TO ADHERE TO CMS IS SIX PROTECTED CLASSES POLICY. NO UTILIZATION MANAGEMENT EDITS ARE PERMITTED FOR ANTI RETROVIRALS. FOR THE OTHER FIVE, PA AND STEP THERAPY REQUIREMENTS MUST BE LIMITED TO NEW STARTS ONLY. WHEN SUCH ISSUES ARE IDENTIFIED THROUGH BENEFICIARY COMPLAINTS, ALL PLANS HAVE QUICKLY ADDRESSED AT THE INDIVIDUAL BENEFICIARIES ISSUE, BUT WE EXPECT MORE. WE EXPECT EACH PLAN TO GET TO THE

WHY AND QUICKLY MAKE ANY NECESSARY SYSTEMIC FIXES SO THE PROBLEM DOES NOT RECUR. WE'VE HAD PLANS, BUT WHEN THESE THINGS CAME UP THEY TOOK CARE OF EVERY SINGLE COMPLAINT. BUT THEY DIDN'T FIX THEIR SYSTEM. SO EVERY TIME A COMPLAINT -- EVERY TIME THE SAME ISSUE SURFACED, THEY AGAIN HAD TO DEAL WITH IT ON A ONE OFF BASIS. THAT'S NOT WHAT WE WANT. WE WANT THE PLANS TO LEARN FROM THESE COMPLAINTS, MAKE THE NECESSARY CHANGES SO THOSE COMPLAINTS DON'T RECUR. WE WANT YOU TO WORK PROACTIVELY WITH US TO RESOLVE ISSUES AND DON'T BE AFRAID TO SEEK THE TECHNICAL ASSISTANCE THAT YOU NEED IN ORDER TO DO THESE THINGS. THERE ARE APPROXIMATELY 29 MILLION MEDICARE BENEFICIARIES RELYING ON US. YOUR MEMBERS AND CMS HAVE HIGH EXPECTATIONS OF YOU. GETTING IT RIGHT THE FIRST TIME YIELDS THE RETURNS WE NEED. BUT DOING SO REQUIRES ENERGY AND EFFORT AND WITH THE COMMITMENT TO INVEST IN SYSTEMS AND PEOPLE WITHOUT CUTTING ANY CORNERS. AT THE END OF THIS CONFERENCE, KNOWING YOUR PLANS OPERATIONS INTIMATELY AND BETTER UNDERSTANDING OUR EXPECTATIONS. I'D LIKE YOU TO ASK YOURSELF THIS ONE SIMPLE QUESTION. ARE THE PART C AND PART D PLANS YOUR COMPANY SELLS GOOD ENOUGH FOR YOU, YOUR FRIENDS AND YOUR LOVED ONES? IF THE ANSWER IS NO, THEN YOU HAVE TO DO MORE BECAUSE YOU AND YOUR COMPANY HAVE AN UPHILL CHALLENGE TO MEET OUR EXPECTATIONS. WITH THAT SAID, I WANT TO TAKE A MOMENT TO THANK YOU FOR BEING HERE FOR THIS CONFERENCE. WE RECOGNIZED THAT YOU'VE GOT BUSY SCHEDULES AND YOU'VE COME A LONG WAY. YOUR ATTENDANCE THIS WEEK DEMONSTRATES THAT YOU ARE

COMMITTED TO MEETING CMS  
REQUIREMENTS AND SHARE OUR  
VISION FOR INSURING MEDICARE  
BENEFICIARIES RECEIVE HIGH  
QUALITY HEALTHCARE. THROUGHOUT  
THE CONFERENCE YOU WILL BE  
HEARING MANY OF OUR EXPERTS TALK  
ABOUT ENROLLMENT, SURVEILLANCE,  
COMPLIANCE, COMPLAINTS, AND  
OVERALL GOOD PRACTICES THAT YOUR  
ORGANIZATION SHOULD FOLLOW. I  
HOPE THAT YOUR COMMITMENT WILL  
CONTINUE BEYOND TODAY AND THAT  
YOU WILL CHALLENGE YOUR  
ORGANIZATION TO EXPLORE NEW AND  
INNOVATIVE WAYS FOR YOUR COMPANY  
TO EXCEED CMS'S EXPECTATIONS.  
THANK YOU AND I HOPE YOU ENJOY  
THE CONFERENCE.