

CMS Contract Year 2011 Marketing Surveillance

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Contract Year 2011 Surveillance Activities

CY 2011 Surveillance Activities

- Secret Shopping of Marketing Events
- Secret Shopping of Personal/Individual Marketing Appointments
- Clipping of Unreported Marketing Events
- Non Renewal/Service Area Reduction Oversight

Contract Year 2011 Surveillance Activities

Regional Office Led Initiatives

- Calls to local agent / broker trade associations
- Calls to shopping event coordinators for plan sponsors
- Secret Shopping public events and personal / individual appointments

Secret Shopping of Marketing Events

- All Parent Organizations assigned a risk status (low, medium, high) based on:
 - Performance during past Surveillance activities
 - Marketing Misrepresentation complaint performance
 - Previous Marketing Related Compliance Issues
 - Explosive Growth
- True Risk: More Risk = More surveillance activities

Secret Shopping of Marketing Events

- Three shopping entities will coordinate on shopping events of parent organizations
- Compliance action to follow progressive compliance model
- Plans with a prior history of poor performance will be at risk for escalating compliance and/or enforcement action

Secret Shopping of Individual Appointments

- CMS to conduct secret shops of personal / individual marketing appointments
- Personal / individual marketing appointments defined by the personal nature of the setting

Clipping Service

- CMS contractor will review print ads for unreported marketing events
- Unreported events may be targeted for secret shopping

Monitoring of Social Media

New activity for 2011!

- Per the Marketing Guidelines – CMS will monitor the use of social media by plan sponsors and contracted agents and brokers
- If necessary, additional guidance will be issued
- Plan materials must be approved prior to use on social media sites

Non Renewal/Service Area Reduction Oversight

CMS has two goals:

- Ensure continuity of services and operations for existing plans
- Ensure appropriate marketing practices for plans in position to gain members

Non Renewal/Service Area Reduction Oversight

Continued

Will use the following to monitor activities:

- Secret Shopping Group Sales Events
- Non-renewal Readiness Assessment
- Complaint Reporting
- Secret Shopping Call Centers

CMS & External Partnerships

- Increasing use of “on the ground” resources
- Continued partnership with the DOI
- Information sharing and access to HPMS data

Surveillance Process and Console Refinements

- Increased timeframe for industry responses from 3 to 5 business days
- Developed weighted categories to assign to each deficiency
 - Administrative, Errors of Omission, Inappropriate Beneficiary Influence, Marketing misrepresentation
- Improved surveillance console report functionalities
 - Comparative data (plan versus industry averages)
 - Report download functionality
 - In process of being migrated to HPMS

Summary

- True Risk Model (More Risk = More Surveillance)
- Appropriate corrective action at initial deficiency phase
- Monitoring Use of Social Media
- Increased “on the ground” resources
- Improved functionality of Surveillance Console
- Five business days to respond to deficiencies

Questions?

