



**CMS 2010 MEDICARE ADVANTAGE & PRESCRIPTION DRUG PLAN SPRING CONFERENCE**

*Sheraton Baltimore City Hotel, April 20-21, 2010*

Verbatim Transcript

Compliance Plans: Panel Discussion

**Part 1**

GOOD MORNING.  
MY NAME IS LIZ LOPEZ-CEPERO,

AND I REPRESENT THE AUDIT SIDE  
OF THE HOUSE.

SO I WANT TO TOUCH ON THE CMS  
COMPLIANCE PROGRAM AUDIT FOCUS

AND PERFORMANCE AUDIT FOCUS  
FOR 2010 AND REALLY HONE

IN ON SOME OF THE KEY  
REQUIREMENTS OF AN EFFECTIVE

COMPLIANCE PROGRAM THAT  
EMPHASIZES PREVENTION,

DETECTION, AND CORRECTION.

AND I DO WANT TO STRESS

THAT CMS IS TAKING THIS  
VERY SERIOUSLY,

NOT ONLY BECAUSE OF  
THE IMPORTANCE OF COMPLIANCE PROGRAMS,

BUT ALSO THAT IT'S  
A GOOD INDICATION

OF THE EFFECTIVE  
INTERNAL CONTROLS OF AN ORGANIZATION IN GENERAL.

SO IT'S A GOOD BENCHMARK  
TO THAT.

AND IF ANYONE WANTS TO KEEP  
A TALLY ON HOW MANY TIMES

I SAY "EFFECTIVE,"  
I'D BE VERY INTERESTED.

I DON'T SAY THAT TO MINIMIZE  
THE WORD,

BECAUSE THAT'S SOMETHING THAT  
WE'RE REALLY FOCUSING ON,

SOMETHING THAT'S EFFECTIVE--

NOT JUST A PAPER EXERCISE,

BUT HOW IT'S EFFECTIVELY BEING  
IMPLEMENTED

AND BEING INCORPORATED  
INTO THE CULTURE OF THE SPONSORING ORGANIZATION.

SO, IN 2010, OUR COMPLIANCE  
PROGRAM AUDITS

ARE GOING TO BE  
MOSTLY ON-SITE.

SO WE'LL BE THERE  
REALLY LOOKING TO SEE

HOW THE COMPLIANCE ORGANIZATION  
HAS INCORPORATED THROUGHOUT THE CULTURE, AGAIN,

OF THE ORGANIZATION.

IT'S NOT JUST A PAPER EXERCISE  
FOR EITHER US OR FOR YOU.

WE WANT TO MAKE SURE THAT THAT  
PLAN'S NOT SOMETHING

THAT'S SITTING ON THE SHELF,  
BUT IT'S REALLY, AGAIN,

IMPLEMENTED AS PART  
OF YOUR CULTURE.

AND WHAT WE'LL BE FOCUSED ON IS  
EVALUATING EFFECTIVENESS,

FINDING AND FIXING PROBLEMS,  
THE PREVENTION AND DETECTION,

AND RESPONDING TIMELY  
AND EFFECTIVELY

TO COMPLIANCE ISSUES.

AND OF COURSE WE WILL BE REALLY  
FOCUSING ON VALIDATING

THAT THIS IS ACTUALLY BEING  
DONE, INCLUDING--

AND THIS IS IMPORTANT--

THE REQUIREMENTS TO IMPLEMENT  
PROGRAMS TO CONTROL FRAUD,

WASTE, AND ABUSE AS WELL.

AND I JUST WANT TO ADD, TOO, THAT WE  
WILL BE UPDATING

CHAPTER 9 TO INCORPORATE PART C  
INTO THE GUIDANCE,

AND THAT WILL ALSO BE  
INCORPORATED TO ADDRESS ANY PARTICULAR MEASURES

FOR DETECTING FRAUD,  
WASTE, AND ABUSE

THAT IS SPECIFIC  
FOR PART C AS WELL.

SO THE FINAL REGULATIONS,

THE TECHNICAL RULE THAT WAS  
PUBLISHED ON APRIL 15,

WERE REALLY INTENDED TO  
SIGNIFICANTLY STRENGTHEN

OUR OVERSIGHT OF COMPLIANCE  
PROGRAMS

AND PROVIDE  
MORE GUIDANCE

AS FAR AS WHAT WE EXPECT TO  
SEE IN A COMPLIANCE PROGRAM

AND WHAT WE'RE GOING TO  
BE REVIEWING

IN THE COMPLIANCE PROGRAM.

SO OVERALL, IT MORE  
CLEARLY ARTICULATES

WHAT OUR EXPECTATIONS ARE.

AND AGAIN, THE REGULATION  
SPECIFICALLY REQUIRES

EFFECTIVENESS OF A  
COMPLIANCE PROGRAM.

AND WHAT THE REGULATION ALSO  
DOES IS PROVIDE MORE SPECIFICS

OF EACH OF THE 7 ELEMENTS OF  
AN EFFECTIVE COMPLIANCE PROGRAM

AND DESCRIBES A LITTLE BIT  
MORE IN DETAIL, YOU KNOW,

WHAT THOSE EXPECTATIONS  
ARE, AGAIN.

AND MOST OF THESE CHANGES ARE  
ALREADY REFLECTED,

OR HAVE BEEN REFLECTED,

IN PART OF  
OUR CHAPTER 9 GUIDANCE

AND EXISTING BEFORE,

BUT THIS IS JUST PUTTING IT  
INTO REGULATORY SCHEME.

AND ALSO, THE PROPOSED  
RULE WAS BASICALLY ADOPTED

IN WHOLE, WITH JUST A  
COUPLE OF MINOR CHANGES.

SO WHAT THE FINAL REGULATION  
DOES IS IT MODIFIES

THE LANGUAGE TO REQUIRE THAT  
ORGANIZATIONS MUST ADOPT

AND IMPLEMENT AN EFFECTIVE  
COMPLIANCE PROGRAM THAT

INCLUDES MEASURES TO PREVENT,  
DETECT, AND CORRECT

NONCOMPLIANCE WITH  
CMS PROGRAM REQUIREMENTS,

AS WELL AS MEASURES TO

PREVENT, DETECT, AND CORRECT FRAUD, WASTE, AND ABUSE.

IT MUST AT A MINIMUM INCLUDE  
THE 7 ELEMENTS

THAT I'LL TALK ABOUT A LITTLE  
BIT MORE SPECIFICALLY.

SO JUST KIND OF WALKING  
THROUGH WHAT THOSE 7 ELEMENTS ARE--

AND, AGAIN, I REFER YOU  
BACK TO THE REGULATIONS

AS PROVIDING MUCH CLEARER  
GUIDANCE ON WHAT THAT EXPLAINS.

BUT THE FIRST ELEMENT  
RELATES TO WRITTEN POLICIES,

PROCEDURES, AND  
STANDARDS OF CONDUCT.

SO WHAT THE REGULATION DOES,  
IT JUST CLARIFIES THE EXISTING

POLICY AND ADDS LANGUAGE THAT  
WRITTEN POLICY PROCEDURES

AND STANDARDS OF CONDUCT  
MUST ARTICULATE THIS PLAN SPONSOR'S COMMITMENT

TO COMPLY WITH  
ALL APPLICABLE FEDERAL AND STATE STANDARDS.

SO, AGAIN, IT'S REALLY  
INCORPORATING THAT CULTURE

OF COMPLIANCE WITHIN  
THE ORGANIZATION.

THESE POLICIES NEED  
TO DESCRIBE

THE COMPLIANCE EXPECTATIONS.

THEY NEED TO IMPLEMENT  
THE COMPLIANCE OPERATIONS,

PROVIDE GUIDANCE TO EMPLOYEES  
AND OTHERS

WHO ARE DEALING WITH POTENTIAL  
COMPLIANCE ISSUES,

IDENTIFY HOW TO COMMUNICATE ISSUES  
OF COMPLIANCE TO OTHER PERSONNEL,

AND DESCRIBE HOW ISSUES ARE  
INVESTIGATED AND RESOLVED.

THE SECOND ELEMENT RELATES TO  
THE COMPLIANCE OFFICER

AND COMPLIANCE COMMITTEE.

SO THE PURPOSE OF THIS  
PROVISION IS REALLY TO ENSURE

THE COMMUNICATION BETWEEN  
THE COMPLIANCE OFFICER,

THE COMMITTEE, AND  
THE GOVERNING BOARD.

SO IT CLARIFIES THAT  
THE COMPLIANCE OFFICER,

WHO'S REALLY VESTED IN  
THE DAY-TO-DAY OPERATIONS OF THE PROGRAM,

MUST BE AN EMPLOYEE  
OF THE PLAN'S SPONSOR.

AND IT ALSO CLARIFIES  
EXISTING CMS POLICY

THAT SENIOR MANAGEMENT NEEDS  
TO BE SUFFICIENTLY ENGAGED AND INFORMED

AND TO EXERCISE  
APPROPRIATE GOVERNANCE

OVER THE ORGANIZATIONS  
COMPLIANCE STRUCTURE.

SO IT'S REALLY KNOWING  
WHAT'S HAPPENING

AND BEING ACCOUNTABLE  
FOR WHAT'S HAPPENING WITHIN THE PLAN'S SPONSOR.

THE THIRD ELEMENT RELATES  
TO EFFECTIVE TRAINING AND EDUCATION,

AND WHAT THIS DOES IS IT ADDS  
A COUPLE OF KEY GROUPS AND INDIVIDUALS

WHO ARE REQUIRED TO HAVE  
COMPLIANCE TRAINING AND EDUCATION.

SO THIS TRAINING MUST OCCUR  
ANNUALLY

AND BE MADE PART  
OF A NEW EMPLOYEE'S ORIENTATION,

ORIENTATION FOR NEW  
FIRST-TIER DOWNSTREAM AND RELATED ENTITIES,

AS WELL AS ANY NEW  
APPOINTMENTS FOR CEOs,

GOVERNING BOARD DIRECTORS,  
OR MANAGERS AS WELL.

AND I THINK THE LANGUAGE IN  
THE REGULATION DOES PROVIDE YOU ENOUGH FLEXIBILITY

TO TAILOR THE CONTENT  
OF THAT TRAINING

AND THE ASPECTS  
OF HOW THE TRAINING IS TO BE PROVIDED AS WELL.

THE FOURTH ELEMENT RELATES  
TO THE EFFECTIVE LINES OF COMMUNICATION,

AND THIS REALLY CLARIFIES  
THE REQUIREMENT

THAT THE LINES OF  
COMMUNICATION ARE CONFIDENTIAL

AND ACCESSIBLE TO ALL,

AND IT ALLOWS FOR COMPLIANCE  
ISSUES TO BE REPORTED ANONYMOUSLY

AND IN GOOD FAITH

AS ISSUES ARE IDENTIFIED.

SO WHAT WE'RE LOOKING FOR HERE  
ARE REALLY EFFECTIVE, EASILY ACCESSIBLE MECHANISMS

FOR EMPLOYEES,  
BENEFICIARIES,

FIRST-TIER DOWNSTREAM  
RELATED ENTITIES,

TO REPORT ANY NONCOMPLIANCE,  
INCLUDING, OF COURSE, FRAUD, WASTE, AND ABUSE AS WELL.

SO WHATEVER MECHANISM THAT IS,

BUT WE'RE REALLY LOOKING  
FOR THAT EFFECTIVE, EASILY ACCESSIBLE MECHANISM.

THE FIFTH ELEMENT RELATES  
TO THE ENFORCEMENT OF DISCIPLINARY STANDARDS,

AND HERE WHAT WE'RE LOOKING FOR  
ARE WELL-PUBLICIZED STANDARDS

AND THAT APPROPRIATE  
DISCIPLINARY STANDARDS ARE BEING APPLIED TO EMPLOYEES

WHO FAIL TO COMPLY.

SO LOOKING FOR THAT--

AGAIN, IT'S BEING APPLIED  
CONSISTENTLY AND FAIRLY

AND ACTUALLY RESULTING IN  
ACTIONS AGAINST EMPLOYEES.

SO WHAT WE'RE LOOKING FOR IS,

WELL, FOR YOU TO ARTICULATE  
EXPECTATIONS FOR REPORTING AND ASSISTING

IN RESOLUTION OF  
COMPLIANCE ISSUES,

FOR IDENTIFYING NONCOMPLIANCE  
OR UNETHICAL BEHAVIOR,

AS WELL AS PROVIDING FOR  
THAT TIMELY AND EFFECTIVE ENFORCEMENT OF STANDARDS

WHEN NONCOMPLIANCE IS FOUND.

THE SIXTH ELEMENT RELATES TO  
EFFECTIVE INTERNAL MONITORING AND AUDITING,

AND THIS REALLY RELATES TO BEING  
ABLE TO UNDERSTAND--

LOOKING INTERNALLY  
WHAT'S HAPPENING WITHIN YOUR ORGANIZATION,

SO FOCUSING ON INTERNAL  
MONITORING AND AUDITS

AS WELL AS EXTERNAL AUDITS  
AS APPROPRIATE,

INCLUDING ANY AUDITS OF FIRST-TIER  
ENTITIES AS WELL.

WHAT WERE LOOKING, REALLY, FOR,  
TOO, IS ANY PERIODIC REVIEW OF COMPLIANCE PROGRAMS

SO YOU CAN ASCERTAIN  
WHETHER OR NOT IT'S EFFECTIVE.

## Part 2

THE SEVENTH ELEMENT  
RELATES TO PROMPT RESPONSE

FOR DETECTED OFFENSES.

SO HERE WE'RE LOOKING  
MORE SPECIFICALLY

FOR DESCRIPTIONS OF  
IMPLEMENTATIONS OF A SYSTEM

AND PROCEDURES FOR PROMPTLY  
RESPONDING TO COMPLIANCE ISSUES

AS THEY'RE RAISED,

INVESTIGATING POTENTIAL  
COMPLIANCE PROBLEMS THAT ARE IDENTIFIED IN AUDITS--

SO ACTUALLY USING THE  
RESULTS OF THOSE AUDITS

TO FURTHER LOOK AT WHAT OTHER  
PROBLEMS MAY BE OCCURRING--

AND CORRECTING THOSE PROBLEMS  
PROMPTLY TO REDUCE THE POTENTIAL

OF ANY REOCCURRENCE

AND TO PROVIDE INSURANCE THAT  
YOU CAN COMPLY WITH CMS REQUIREMENTS ONGOING.

SO THERE'S A COUPLE  
THINGS THAT--

TO ASK YOURSELF,

AS FAR AS WHETHER OR NOT  
YOU HAVE AN EFFECTIVE COMPLIANCE PROGRAM.

YOU NEED TO ASK YOURSELF,  
YOU KNOW, IS YOUR PROGRAM

PREVENTING, DETECTING, AND  
CORRECTING EFFECTIVELY?

ARE THE MEDICARE SPECIFIC  
PROVISIONS THAT MUST BE COMPLIED WITH,

LIKE THE FALSE CLAIMS ACT,  
STARK,

ARE INCORPORATED AND  
WRITTEN INTO YOUR POLICIES AND PROCEDURES?

DO THE COMPLIANCE OFFICER  
AND COMPLIANCE COMMITTEE

REPORT DIRECTLY TO THE CEO  
OR GOVERNING BOARD?

IS THE BOARD INFORMED  
ABOUT WHAT'S GOING ON?

ARE YOU CONDUCTING RISK  
ASSESSMENTS AND INTERNAL MONITORING AND AUDITS?

DO YOU HAVE THE PROPER  
INTERNAL CONTROLS OVER ALL THE OPERATIONAL PROCESSES

AND ANY DELEGATED ENTITIES?

AS JEN STRESSED, IT'S SUCH  
A CORE IMPORTANCE

THAT WE'RE FOCUSING ON.

AND DO YOU TAKE PROMPT,  
EFFECTIVE CORRECTIVE ACTION

ON COMPLIANCE ACTIONS  
WHEN THEY ARE IDENTIFIED?

AND SO THAT'S KIND OF  
COMPLIANCE PROGRAMS IN A NUTSHELL,

AND I'LL JUST TURN KIND OF  
QUICKLY TO GIVE YOU

JUST A SNIPPET ABOUT  
OUR 2010 ONSITE PERFORMANCE AUDITS FOR 2010.

AND THIS YEAR, OUR STRATEGY  
IS REALLY IS FOCUSED.

WE ARE NOT DOING THE BROAD-BASED  
AUDITS OF EVERYTHING.

WE ARE REALLY TAILORING  
ON THOSE KIND OF CORE COMPLIANCE AREAS.

WE'RE SIMPLIFYING  
THE PROCESS,

I THINK MUCH TO YOUR BENEFIT,  
AS WELL AS OUR BENEFIT, TOO.

AND WE'RE SHORTENING  
TIME FRAMES,

NOT ONLY ON THE FRONT END,  
BUT ON THE BACK END AS WELL,

WHICH SHOULD, AGAIN, HELP  
KIND OF THE AUDIT PROCESS MOVE A LITTLE MORE SWIFTLY.

THE CAP PROCESS WILL BE  
ALTERED A LITTLE BIT.

THERE WILL BE A NOTICE  
OF DEFICIENCIES AND TIMELINE CORRECT

AND MAY NOT QUITE FOLLOW  
THE SAME TRADITIONAL CAP/CAR PROCESS

THAT WE ARE  
TRADITIONALLY USED TO.

AND SPONSORS, WE'RE DOING  
ONGOING RISK ASSESSMENT

AND REALLY FOCUSING ON  
SPONSORS THAT ARE SELECTED

BASED ON RISK INDICATORS,

SO, YOU KNOW, LOOKING  
AT PAST PERFORMANCE,

LOOKING AT CTM AND COMPLAINT  
RATES, LOOKING AT, YOU KNOW,

HAS THERE BEEN ANY SURGE OF  
ENROLLMENTS

OR ANY ISSUES COMING UP,

AS WELL AS ANY REFERRALS  
THAT MAY COME FROM OTHERS

AND THE ACCOUNT MANAGERS  
AND THE REGIONS AS WELL.

SO THE AREAS THAT WE ARE GOING  
TO BE FOCUSING ON, YOU KNOW,

OBVIOUSLY THE COMPLIANCE  
PROGRAM AS KEY,

BUT ALSO LOOKING AT ACCESS,

AND AS JEN SAID,

THERE'S NOTHING MORE  
CORE TO THE BENEFIT

THAN ACTUALLY PROVIDING THE  
SERVICES THAT ARE REQUIRED.

BUT AS THAT CONTINUUM MOVES ON,

ALSO LOOKING AT APPEALS  
AND GRIEVANCES, REDETERMINATIONS,

ENROLLMENT, DISENROLLMENT.

MARKETING--AS JEN SAID,  
IT IS HAS ALWAYS BEEN A FOCUS.

BENEFICIARY OF COMMUNICATION  
WITH THE ANOCs, EOCs,

AS WELL AS PREMIUM BILLING.

SO THOSE ARE SOME OF THE CORE  
PERFORMANCE AREAS

THAT WE'LL BE FOCUSING ON,

AND AGAIN, REALLY--

YOU WILL BE SEEING THAT IT IS  
MORE OF A STREAMLINED PROCESS,

ELIMINATING A LOT OF  
THE TIME ON THE FRONT END AND THE BACK END

AND HOPEFULLY DECREASING  
SOME OF THE BURDEN ON YOU

IN PREPARATION FOR  
THESE AUDITS AS WELL.

AND THAT'S ALL I HAD  
FOR RIGHT NOW,

SO I THINK WE'RE READY  
TO ANSWER ANY QUESTIONS THAT YOU MIGHT HAVE.

Woman: AGAIN, IF YOU  
CAN COME TO THE MIC IF YOU HAVE ANY QUESTIONS...

- WOW. THAT WAS CLEAR. OK.

OH, OK, GREAT.

Different woman:  
GOOD MORNING.

GOOD MORNING.

IN YEARS PAST,  
CMS HAS PROVIDED THE AUDITING TOOLS

IN THE MONITORING GUIDE,

AND WE HAVEN'T SEEN THOSE  
IN QUITE A WHILE,

AND VERSION 4 WAS  
MADE PUBLIC TO US.

BUT YOU KNOW, AUDITING WITH  
VERSION 6.1,

I'M CURIOUS IF CMS IS CONSIDERING  
RELEASING THOSE TOOLS BACK TO THE PLANS

SO THAT WE CAN BETTER MONITOR  
OUR INTERNAL PRACTICES.

Liz Lopez-Cepero:  
DO YOU WANT TO REFER  
TO THE UNIVERSAL GUIDE OR...

Jennifer Smith:  
I THINK THAT THE BEST WAY  
WE CAN ANSWER THAT IS

I DON'T THINK RIGHT NOW  
THERE'S ANY PLAN TO RELEASE THEM TO THE PLANS,

AND ONE OF THE REASONS WHY  
IS THERE'S A LITTLE BIT OF A DOUBLE-EDGED SWORD.

WE UNDERSTAND THAT  
YOU LIKE TO USE OUR GUIDES

TO DEVELOP YOUR OWN  
INTERNAL AUDIT GUIDES.

I COMPLETELY  
UNDERSTAND THAT.

I THINK WHAT WE WERE SEEING  
WAS A LITTLE BIT OF PEOPLE PERFORMING TO THE GUIDES

AS OPPOSED TO PERFORMING  
TO THE REQUIREMENTS IN THE MANUAL,

AND I COMPLETELY UNDERSTAND  
THAT OUR REGULATIONS AND OUR MANUAL GUIDES

ARE VERY EXTENSIVE,

BUT THEY MAY NOT BE  
COMPREHENSIVE TO EVERYTHING

THAT IS A REQUIREMENT  
IN THE PROGRAM,

AND SO IT CAN BE  
SOMEWHAT LIMITING FOR A PLAN,

OR POTENTIALLY EVEN  
DAMAGING FOR A PLAN,

IF YOU ARE AUDITING  
TO WHAT'S IN THE GUIDE

AND MIGHT MISS OUT  
ON SOMETHING,

BECAUSE JUST  
BECAUSE SOMETHING IS NOT IN AN AUDIT GUIDES

DOESN'T MEAN  
WE'RE NOT GONNA COME AND AUDIT ON IT.

SO YOU'RE REALLY HAVE TO  
FOCUS ON ALL OF THOSE PROGRAMMATIC REQUIREMENTS.

I CAN SAY WHAT LIZ  
WAS REFERRING TO.

WHAT WE DID MOST RECENTLY

IS, WE HAD TO PUT OUR AUDIT GUIDE

THROUGH THE PRA  
PROCESS, PAPERWORK REDUCTION ACT.

AND SO WE USED TO HAVE  
SEPARATE GUIDES,

ONE FOR C  
AND ONE FOR D,

AND WE'RE MOVING AWAY  
FROM HAVING A C AND A D GUIDE

TO PROTOCOLS DESIGNED  
AROUND SPECIFIC OPERATIONAL AREAS,

SO APPEALS  
AND GRIEVANCES,

ENROLLMENT  
AND DISENROLLMENT,

FORMULARY ADMINISTRATION.

AND THOSE WOULD BE--

FOR CERTAIN ONES,  
THEY WOULD CROSS C AND D.

AND SO WHAT WE DID IS WE  
ISSUED WHAT THEY'RE CALLING

THE "UNIVERSAL  
AUDIT GUIDE"

IN THE FEDERAL REGISTER,

AND IT INCLUDES  
ALL OF THE ELEMENTS

THAT WE COULD POSSIBLY  
AUDIT YOU ON.

IT'S VERY EXTENSIVE.  
IT'S A VERY LONG LIST.

IT DOESN'T MEAN THAT  
WHEN WE COME TO AUDIT YOU

WE'RE GOING TO AUDIT YOU  
ON ALL THOSE ELEMENTS,

BUT AT LEAST IT

GIVES YOU AN IDEA  
OF ALL OF THE THINGS  
WE COULD POTENTIALLY ASK YOU INFORMATION ON,  
AND WE ALSO  
PROVIDED SOME EXAMPLES  
OF WHAT A UNIVERSE REQUEST  
LETTER WOULD LOOK LIKE  
ON A TYPICAL FOCUSED AUDIT,  
WHAT A SAMPLE REQUEST LETTER  
WOULD LOOK LIKE  
ON A TYPICAL FOCUSED AUDIT,  
SO THAT YOU COULD  
GET SOME IDEA ABOUT THE POTENTIAL BURDEN  
YOUR ORGANIZATION MIGHT  
HAVE TO GO THROUGH  
FOR A FOCUSED AUDIT  
UNDER THE REDESIGN EFFORT.

Woman:  
THANK YOU.

Jennifer Smith:  
YOU'RE WELCOME.

GOOD MORNING. CINDY LYNCH  
WITH CAREMORE HEALTH PLANS.

I WONDER IF YOU COULD SPEAK  
A MOMENT ABOUT THE COMPONENT OF THE STAR RATING

THAT'S ASSOCIATED WITH AUDITS,

PARTICULARLY IF YOUR FOCUS  
IN 2010 AND PERHAPS BEYOND

IS GOING TO BE ON SPECIFIC  
AD HOC OR FOCUSED AREAS FOR COMPLIANCE.

A PLAN COULD, YOU KNOW, RECEIVE  
3 OR 4 DIFFERENT AUDITS

DURING A MEASURE YEAR  
FOR THE STAR RATING.

IS ALL OF THAT GOING

TO BE CUMULATIVE?

DOES IT INCLUDE BID AUDITS,  
FINANCE AUDITS?

IS IT ONLY OPERATIONAL AUDITS?

CAN YOU SPEAK TO THAT A LITTLE?

Liz Lopez-Cepero:  
WELL THERE'S  
A SEPARATE COMPONENT

THAT COMPILES  
TOGETHER THE INFORMATION FOR THE STAR RATINGS.

SO, I THINK  
THAT'S AN EFFORT

THAT'S DONE  
BY TWO OTHER GROUPS THAT FOCUS ON IT.

SO I'M NOT --

I CAN'T REALLY  
SPEAK TO THAT,

WHETHER  
THAT'S GONNA BE INCORPORATED --

HOW IT'S GOING TO BE  
INCORPORATED IN THE STAR REVIEWS.

I THINK THERE MAY BE  
OTHERS LATER

THAT ARE GOING TO BE  
TALKING MORE DIRECTLY ABOUT THAT,

BUT YOU KNOW, FOCUSING  
ON PAST PERFORMANCE,

BUT DEFINITELY  
AUDIT RESULTS HAVE BEEN--

AGAIN, I CAN'T SPEAK FOR  
THE GROUP THAT CREATES THE STAR RATINGS.

WE JUST PROVIDE  
THE INFORMATION

FOR THEM  
TO DO WITH IT WHAT THEY WILL

ON THE STAR RATING  
SITE.

BUT WE CAN GET BACK  
TO YOU ON THAT.

Woman:  
OK.

Jennifer Smith:  
YEAH.

I WOULD SAY, I THINK  
THEY'RE GENERALLY --

AND I MAY BE WRONG, BUT  
I THINK THEY'RE GENERALLY CALCULATED

THROUGH CAPS  
FROM PROGRAM AUDITS, PERFORMANCE AUDITS.

BUT WE'RE WORKING TO  
BEGIN TO INCORPORATE ALL AUDIT RESULTS,

SO PERFORMANCE AUDITS.

ONE THIRD FINANCIAL  
AUDITS, ALL THAT.

HOWEVER, AGAIN, WE DON'T  
DO THAT CALCULATION,

SO DON'T HOLD ME TO THAT,

BUT I THINK THAT'S HOW  
THEY'RE DONE CURRENTLY.

Woman:  
OK. THANK YOU.