

IMPORTANT AUDIT UPDATES

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Today's Discussion Topics

- Background
- Review Data Based on Audits Conducted in 2008
- Top 5 Deficient Elements related to Enrollment/Disenrollment for Parts C/D
- CMS' Requirements for ensuring Compliance
- Monitoring of Deficient Elements related to Enrollment/Disenrollment
- Methods of Monitoring Plan Performance

Background

- System updates/conversions or testing phase of a new system
- Training Your Staff
- Maintaining current *Medicare Managed Care Manuals/HPMS Notices*
- Developing and Updating Policies and Procedures

Audits Conducted in 2008 for Parts C/D

- **146** parent organizations were audited in 2008
- Part C: 396 affiliated contracts (MA and MAPD)
- Part D: 265 affiliated contracts (MAPDs and Stand-alone PDPs)

Top 5 Deficient Elements related to Enrollment/Disenrollment Part C

- DN06
- ER05
- DN02
- ER07
- DN01

Element DN06

Involuntary Disenrollment for Move Out of Service Area

42 C.F.R. § 422.74(d)(4); Manual Ch. 2 - Section 50.2.1



Element ER05

Required Enrollment Notice (Timeliness)

42 C.F.R. § 422.60(e)(3); Manual Ch. 2 - Section 40.4, 40.4.2



Element DN02

Voluntary Disenrollment (Timeliness)

42 C.F.R. § 422.66(b)(3); Manual Ch. 2 - Section 50.1.4



Element ER07

Denial of Enrollment Prior to Transmission to CMS (Timeliness)

42 C.F.R. § 422.60(e)(3); Manual Ch. 2 - Section 40.2.3



Element DN01

Compliant Disenrollment Process

42 C.F.R. § 422.66(b); § 422.74; Manual Ch. 2 - Section 50.4.1



Top 5 Deficient Elements Related to Enrollment/Disenrollment Part D

- ER13
- ER09
- ER08
- DN07
- ER06

Element ER13

Confirmation of Enrollment for Members of Employer Group/Union Receiving Employer Subsidy

Prescription Drug Plan Guidance Eligibility, Enrollment, and Disenrollment



Element ER09

Auto- and Facilitated-Enrollment of Full Benefit Dual-Eligible Beneficiaries and other Low Income Subsidy Eligible Beneficiaries

42 CFR § 423.34(d), PDP Solicitation, PDP Guidance Eligibility, Enrollment and Disenrollment
Medicare Managed Care Manual Chapter 2, Chapter 01: Enrollment and Disenrollment



Element ER08

Provision of Materials Prior to the Effective Date of Enrollment

PDP Guidance Eligibility, Enrollment and Disenrollment, Medicare Marketing Guidelines
for MAs, MA-PDs, PDPs, and 1876 Cost Plans



Element DN07

Required Disenrollment for Move Out of Service Area (Except for Auto and Facilitated Enrollees)

Ref: 42 CFR § 423.44(b)(2)(i), § 423.44(c), § 423.44(d)(5), PDP Guidance Eligibility,
Enrollment and Disenrollment



Element ER06

Enrollment Notice and Evidence of Coverage Requirement (Timeliness)

Ref: 42 CFR § 423.32(d) PDP Guidance Eligibility, Enrollment and Disenrollment
Medicare Marketing Guidelines for MAs, MA-PDs, PDPs and 1876 Cost Plans



Element ER06 (cont.)

Part D sponsors must also send a combined ANOC/EOC notice to all new members....

Ref: 42 CFR § 423.32(d), PDP Guidance Eligibility, Enrollment and Disenrollment,
Medicare Marketing Guidelines for MAs, MA-PDs, PDPs, and 1876 Cost Plans



Corrective Action Reports

- Does not meet CMS Requirements for this Element
- Failed to Demonstrate Compliance
- Inadequate Policies and Procedures
- Insufficient/Inadequate Documentation Provided
- Misclassified samples

An additional note about Corrective Action Reports

**Impact of the deficiency (ies) found on
Medicare beneficiaries.....**



Methods of Monitoring Plan Performance

- Regular reporting requirements
- Monthly conference calls
- Focused Audits
- Referral for Non-compliance

Questions?

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Thank you!!

