

Centers for Medicare & Medicaid Services

Compliance and Plan Management in the Post-MMA Implementation Period

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Brand

Medicare IS OUR BRAND

Brand

- To the public, Medicare is Medicare
- All our reputations rely on Medicare's integrity and public trust
 - Future success of Medicare Advantage program depends on it
 - Do not violate the public trust

The Future

- Continued scrutiny from
 - Plan members
 - Public
 - Oversight agencies
- CMS more driven by outcome
 - We are in the execution phase of MMA
- We must work together

Beyond Implementation

- Execution Stage
 - Operations
 - Compliance
 - Plan management
 - Improving processes
 - Beneficiary impact
 - Public perception
- Plans must be the first line of defense
 - Be proactive

CMS Monitoring Activities

- Secret Shopper
 - A plan is only as compliant as its agents
- Marketing Materials
 - Prepare for increased scrutiny on advertising
- Internal Communications
 - Get information to the top
- Corrective Actions
 - Internal plan systems
 - CMS actions now posted on website

Additional CMS Monitoring Activities

- Medicare Image
- Broker tests
- PFFS call backs
- Problems in the industry
- Compliance

**We give you the floor -
not the ceiling!**

Plans Should

- Protect the Medicare brand as you do your own
- Increase compliance activities
 - Expect requirements to be expanded
- Be proactive to determine threats and problems
 - Mine data
 - Analyze complaints

Plans Should

- Increase outreach to providers
- Ensure beneficiaries get accurate, clear, and concise information
- Increase oversight of agents and brokers
- Have early warning system for critical marketing issues
- Ensure direct lines to senior management

Steps For the Future

- Together, we must
 - Ensure guidance fully implemented
 - Identify emerging issues quickly
 - Increase provider and beneficiary education
 - Be proactive, not reactive
 - Focus on outcome – effect on members
 - **Protect the Medicare brand**

Medicare