



ICE 2016 Annual Conference Premiere



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2016 Annual Conference

Compliance & Audit Landscape

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Compliance



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Wealth of CMS information to improve compliance:

- Annual audit guidance
- Best practice memos
- Mock audit guidelines
- Corrective action plans
- Civil monetary penalty letters
- Frequent webinars/conference on the topics

Yet many 2016 audit findings were a repeat of 2015

Audit Findings



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Common Audit Findings from 2015 to 2016:

Compliance Program Effectiveness:

- Delegated oversight was lacking or insufficient
- Communication of compliance information to plan personnel was lacking
- Barred providers/exclusion reviews were not performed on delegated subcontractors
- Lack of updating of senior leadership on compliance monitoring and findings
- Risk assessment and monitoring was insufficient

Audit Findings



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Common Audit Findings from 2015 to 2016:

Coverage Determinations, Appeals and Grievances

- Denial notice/letter was missing or insufficient; lack of clear and concise verbiage and denial rationale
- Lack of auto-forwards to Independent Review Entity (IRE)
- Insufficient outreach to providers for lack of clinical information before authorization or appeal denied
- Case timeliness violations
- Misclassifications of cases (e.g., Appeals classified again as Coverage Determinations)

Audit Findings



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Organization Determinations, Appeals and Grievances

- Case timeliness violations
- Denial notice/letter was missing or insufficient; lack of clear and concise verbiage and denial rationale
- Inappropriate denial of services or payments
- Insufficient outreach to providers for lack of clinical information before authorization or appeal denied

Compliance Focus and Actions Increasing



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Corrective Actions

- Notice of Non-Compliance
- Warning Letters
- Corrective Action Notices

Enforcement Actions

- Civil Monetary Penalties
- Intermediate Sanctions (Suspension of Enrollment, Marketing, and Payment)

Contract Actions

- Termination
- Non-Renewal

Audit Trends/Process



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Key objectives to be audit-prepared throughout the year:

- Ongoing monitoring by departments is key – these are SMEs, not Compliance
 - Keep detailed issue logs of issues and remediation of issues
Report to compliance as necessary
 - Follow Regulatory templates
 - Get in the habit of running universes monthly or twice monthly so you have a thorough understanding of the fields, values, and what makes sense when the universe is populated
- Compliance should independently audit
- Be transparent with Regulators. Disclosed and self-identified issues can help tremendously on audit findings, both formally under the regulations and informally with your auditor

Audit Preparedness



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Key objectives to be audit-prepared throughout the year:

- Self-assess weaknesses, especially regarding the common findings mentioned in this presentation.
- Review and use the multitude of information CMS and other regulatory agencies publish for plans to perform well on audits, such as job aids
- HPMS memos and traceability throughout organization
- Policies and Procedures - regularly review against memos and new guidance
- Oversight of First Tier, Downstream and Related Entities (FDRs) - Include delegated entities in universe mock drills and mock audits and closely scrutinize the accuracy of the information.

Agenda



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- Mock Audit Session
 - Mock audit on a case file
 - Group activity – mock audits
- Q&A