



"One process to unite them all"

2019 Annual Conference 


**FIRST TIER ENTITY
ONLINE
COMPLIANCE ATTESTATION & AUDIT TOOL**



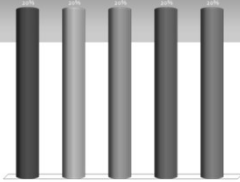
ICE Contracting & Compliance Team Co-Leads:
 Shelley Segal, Medicare Compliance Solutions
 Ralph Oyaga, Heritage Provider Network
 Gail Blacklock, Inter Valley Health Plan

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WHAT ARE THE BENEFITS TO COLLABORATE?


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- A. Makes my life easier
- B. I get to share ideas with others who have great ideas
- C. I learn new information
- D. It make it easier to achieve compliance
- E. All of the above

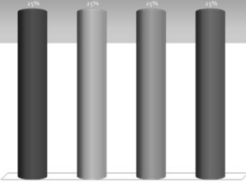


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ARE YOU COLLABORATING?

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- A. Yes
- B. No, I want to join
- C. No, I am waiting for the golden ring
- D. I just don't have time




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Alignment Healthcare USA	Inter Valley Health Plan
Blue Shield of California	Molina Healthcare, Inc.
Brand New Day	SCAN Health Plan
Chinese Community Health Plan	Sharp Health Plan
Community Health Group	UnitedHealthcare
Central Health Plan of California	Vitality Health Plan of California
Humana	WellCare of California
Inland Empire Health Plan	

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CMS REQUIREMENTS 2019
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"We swears to serve the master of Regulations"

• **Requirement**

- The Centers for Medicare & Medicaid Services (CMS) requires Sponsors communicate and monitor specific compliance and fraud, waste, and abuse (FWA) requirements.
- Title 42 of the Code of Federal Regulations, Parts 422 and 423
- Medicare Prescription Drug Benefit Manual Chapter 9, and Medicare Managed Care Manual Chapter 21

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CMS REQUIREMENTS 2019
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"There is only one Lord of the Regulation, only one who can bend it to his will. And he does not share power."

• **Sponsors are ultimately accountable**

- Sponsors may contract with FDRs to perform certain functions on its behalf, the Sponsor maintains ultimate responsibility for fulfilling the terms and conditions of its contract with CMS and for meeting the Medicare program requirements, including ensuring that FDRs are in compliance with all applicable laws, rules, and regulations with respect to delegated responsibilities.

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FIRST TIER ENTITY (FTE) ONLINE ATTESTATION

"Even the smallest collaborative efforts can change the course of the future."

- **Intent**
 - To create greater industry-related collaboration and reduce burden on Medicare Advantage Organizations (Sponsors) and their first tier entities by providing "ONE" compliance attestation to execute.
 - First tier, downstream, related entities (FDRs/FTEs)

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PRE-FTE ONLINE ATTESTATION

"The time of burdensome audits is over. Do we leave FTEs to their fate of multiple audits? Do we let them stand alone?"

- **Pre-process: The battle of the 5 armies**
- **How big is your battle?**

```

graph TD
    MAO((MAO Sponsor Organizations)) --> FTE1((FTE #1))
    MAO --> FTE2((FTE #2))
    MAO --> FTE3((FTE #3))
    MAO --> FTE4((FTE #4))
    MAO --> FTE5((FTE #5))
  
```

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FTE ONLINE ATTESTATION

"For the time will soon come when ICE Standardization will shape the fortunes of all."

- **2020 Process & Updates**
 - 14 Participating MAO Sponsors
 - Database of over 1600 FTEs
 - Auto-generated emails by ICE or Sponsor to FTEs with link and instructions for login account & online submission
 - Updated 2018 FTE Attestation with links to Resource Documents, Offshore Attestation Process, and Corrective Action Plan submission templates.
 - Sponsor ability to maintain FTE database
 - Sponsor reports with Excel report download
 - FTE click n' submit attestation – one time submission for ALL contracted MAOs
 - Electronic copy for FTEs and Sponsors – support documentation for audits
 - FTE Audit Tool 2020 roll-out

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**FTE ONLINE ATTESTATION
AUDIT TOOL 2020** 2019
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"There's some good in industry collaboration, Mr. Frodo...and it's worth fighting for."

- **Purpose**
 - To facilitate the auditing of FTE Attestation submissions and the sharing of audit findings among the various sponsors
 - Phase 1: Create a shared audit tool – based on the current online FTE Attestation

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**FTE ONLINE ATTESTATION
AUDIT TOOL 2020** 2019
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IV.a First tier entry has a system in place to receive, record, respond to and track compliance questions or reports of suspected or detected noncompliance or potential FWA from **Employees**. Reporting systems must maintain confidentiality (to the greatest extent possible), allow anonymity if desired (e.g., through telephone hotlines or mail drops). The methods available for reporting compliance or FWA concerns and the non-retaliation policy are publicized throughout the first tier entry's facilities.

Audit Elements:

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**FTE ONLINE ATTESTATION
AUDIT TOOL 2020** 2019
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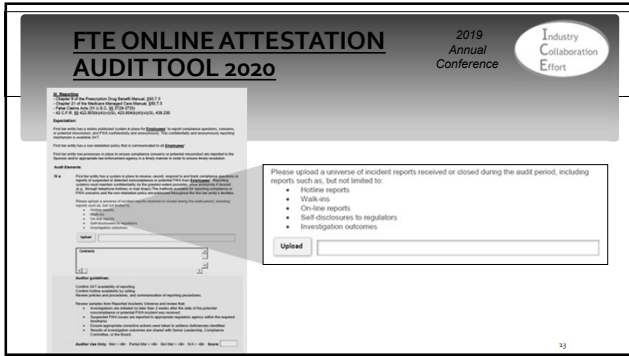
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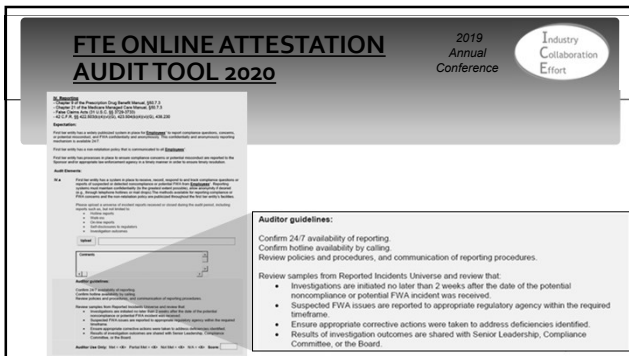
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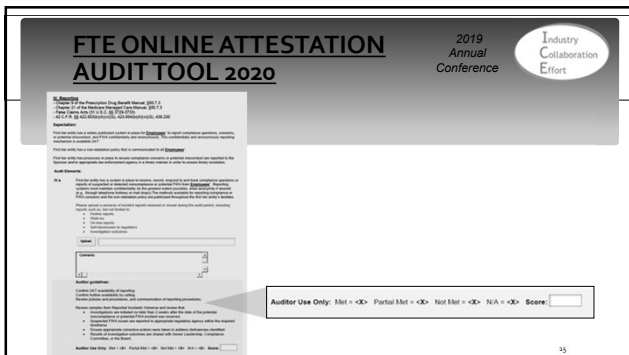
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**FTE ONLINE ATTESTATION
AUDIT TOOL 2020**

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"All we have to decide is what to do with the time that is given us."

- **Shared Audit Tool System Design**
 - Phase 2: Design the Audit Tool System.
 - Desired functionality:
 - Scheduling audits
 - Sharing audit data
 - Reporting audit results
 - **How should this work?**

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WHAT SHOULD THE SCOPE OF THIS FTE AUDIT BE?

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Industry Collaboration Effort

Option	Percentage
A. Limit scope to FTE Attestation elements	48%
B. Include some elements of other Compliance Audits	32%
C. Expand to a Global Compliance Program Audit	18%

- A. Limit scope to FTE Attestation elements
- B. Include some elements of other Compliance Audits
- C. Expand to a Global Compliance Program Audit

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**DO YOU BELIEVE?
A SHARED AUDIT SYSTEM?**

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Response	Percentage
A. Yes	42%
B. No	38%
C. I need more information to make that determination	18%

- A. Yes
- B. No
- C. I need more information to make that determination

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COLLABORATION FOR ALL


"The Ring has awoken, it's heard its master's call."

- **Collaboration BENEFITS everyone**
 - Sponsor collaboration increased from original 7 Sponsors 2018; 11 Sponsors 2019. Currently 14 Sponsor moving in to 2020
 - First Tier Entities 1800 to date - Participation has improved overall - from 2018 paper submission with average 30% response rate – to 2019 online submission average response rate 48%.
 - Improvements to the 2020 submission process and a "true" one-time submission of the attestation that is sent to FTEs contractors sponsors–projections for response = 70%

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SPONSORS CAN JOIN THE FELLOWSHIP BY CONTACTING SPEAKERS/TEAM CO-LEADS

- **"Samwise GamGee"**
 - Shelley Segal, Principal, Medicare Compliance Solutions
 - ShelleySegal@medcompsol.net


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SPONSORS CAN JOIN THE FELLOWSHIP BY CONTACTING SPEAKERS/TEAM CO-LEADS




"Aragorn"


Ralph Oyaga
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"Gandalf"

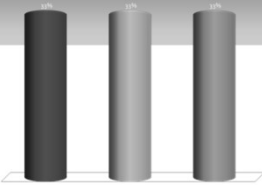
Gail Blacklock
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 Compliance Officer
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WILL YOU JOIN THE FELLOWSHIP OR WILL YOU JOIN WITH DARK LORD OF SAURON???



A. I am joining the fellowship
 B. I am on the quest to destroy the ring and return ORDER
 C. I need to see the movie.

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2020

C&C Team

- As an MA Organization/Sponsor you have a choice in our quest to destroy the ring and return order.....
- How we can assist you?
- Questions????
- Next Steps????



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