Becoming friendly with		
CMS		
Top Proven Tips for Communicating	Jak W	n
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## Bios



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- Practice Leader,
  Audit and
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  10 years of
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- Oversees 150+ audits for Burchfield annually The Burchfield Group



- Wendy Richey
- Chief Compliance Officer
- Over 35 years of corporate compliance, government programs and operations experience in the healthcare arena

Clover Health Plan

## Goals

Try not to think of your relationship with CMS as a relationship with the IRS  $\,$ 

- They're not there to "catch you" doing something wrong if it feels like that today, you can turn it around
- It takes work on your part to turn it around, though!

Why work toward a strong relationship?

- Quid pro quo the more you share, the more you'll benefit
- Priority access to issue resolution
- Over time, you'll spend less time worrying about the specific wording on a response, and more time on things that matter

How to	improve	your da	y-to-day	with	CMS
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- 1. Building a relationship
- 2. Relationship credibility and respect
- 3. Don't argue
- 4. Remember the rules
- 5. Be transparent

Compliance is not a job, it's a mission



Compliance Mission Statement:

"Uphold the highness level of ethical standards, and do the right thing at all times to protect our members."

Building a Relationship

# Building a Relationship

- Relationships take work, especially if it starts one-sided
  - We've all heard of "friendly" CMS RAs that may be an exception, not the norm
- You need to prioritize *quality* interchanges

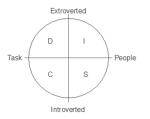
  - Use the time before a meeting starts What personal details do you know about each other?
  - Focus on shared interests
- Find ways to make them more successful
  - How is their success measured by their boss or department?

# Building a Relationship

There are a variety of tools that can help

One tool - DISC

- D be direct, brief, to the point
- I build rapport, let them verbalize
- S don't be pushy; give specifics
- C pay attention to details; don't generalize



Relationship Credibility and Respect

Relationship	Credibility	and	Respect
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Conduct internal monitoring and talk about it. Hiding is the worst decision a plan could make!



Keep CMS informed on what you're doing. Rolling out a marketing campaign, launching a member touch initiative, or developing new processes? Let CMS know!



Relationship Credibility and Respect

### Be authentic and personal

- Small talk not too personal but not cold think small talk with an alum or an ex-colleague
- Don't send mass emails if most of your emails aren't 1:1, it may be an area for improvement
- Can you find ways to be in-person?

## Being vulnerable can payoff

- Ask your RA for input on the draft audit protocols
- Sometimes, as you learn about a topic, your CMS contacts do too

Don't Argue

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Don't Argue	
It is not uncommon for an executive to get frustrated and want to argue a	
rule or decision CMS has made. Don't do it!	
Instead, be thoughtful and ask questions if something doesn't make sense. In the end, the rules are the rules.	
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Don't Argue	
State the situation  • Put yourself in their shoes – they need background and context to understand	
Communicate the facts, but also your concerns  • Your concerns, when honest, add depth and sincerity	
Deliver the bottom-line  • Clear, memorable, actionable	
Use open-ended questions  • A request expressed as a question—one that cannot be answered by a yes or no—is less threatening. How do you feel about this? How can we solve this problem?	
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Remember the Rules	
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Remember the Rules  Be accountable  Test  Validate	
Be Transparent	
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Be Transparent	
Don't hide issues or questions, it will come back around!	
Include CMS in the situation to help with a resolution.  TRUST THROUGH TRANSPARENCY	
What do you gain? Confidence, trust, and respect.	

Be Transparent	
(AT THIS POINT, WILL PULL UP LIVE INTERNET POLL)	
<ul> <li>How many times did you give CMS a "heads up" on any issue in the last year?</li> <li>0 – 2</li> </ul>	
3-6	
7–10	
10+	
19	
Summary	
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Summary	
Work at building an authentic relationship with your CMS contacts	
Keep CMS informed about what you're doing	
Use disagreements as learning experiences	
Be transparent – lean toward over-sharing than under-sharing	
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