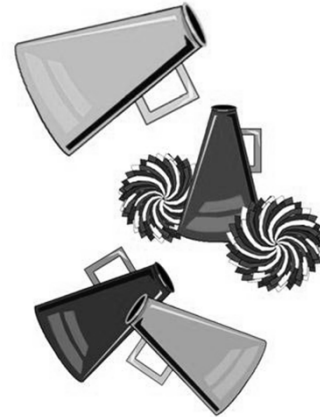


**Gimme a C! Gimme an A!
Gimme a P!
What's that spell? CAP! Does
it work for you?**



ANNE CRAWFORD, DIRECTOR, ATTAC CONSULTING GROUP, LLC

CLIFTON SCHMIDT, MEDICARE COMPLIANCE OFFICER, SELECTHEALTH

ATTAC Consulting Group



- Founded in 2003 and headquartered in Ann Arbor, MI.
 - Provides expertise and support in health plan strategy, operations and process controls, provider networks, governmental compliance and audit, clinically integrated networks, incentive and risk models, and population health.
 - Specializes in:
 - Medicare Advantage, Part D, MMPs, Medicaid, ACA / Exchange
 - Operational Design and Control Development
 - Regulatory Compliance and Auditing and Remediation
 - Program and Plan Development and Business Process and Control Engineering
 - Health Plan and Provider Network Development and Operations
 - Provides expert Regulatory Advice, to implement robust Compliance Solutions and to perform efficient, expert Auditing.
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SelectHealth



- SelectHealth is a not-for-profit health plan with headquarters in Murray, Utah.
- Established in 1984 as a subsidiary of Intermountain Healthcare.
- Offering multiple lines of business (Large/small employer, ACA exchange, federal government plans) with more than 800,000 members in Utah and Idaho.
- Began offering Medicare Advantage – Prescription Drug plan in 2013. Currently serving 40,000 beneficiaries in MAPD plan.
- CMS Program Audit in 2015.

CMS Program Audit – You’ve Got Findings!

- Audit report outlines your findings.
- CMS designates status of your findings:
 - ICAR (Immediate Corrective Action Required)
 - CAR (Corrective Action Required)
- CMS requires that a Corrective Action Plan (CAP) be drafted for each finding and submitted for review and approval.
- What are your next steps?

Gimme a C! = Determining the Cause

- Is it a People problem?
 - Lack of training
 - Lack of resources
- Is it a Process problem?
 - Something is broken in the workflow
- Is it a System problem?
 - Need to reconfigure hardware/software, or invest in new systems
- What Issues arise in determining the cause?
 - Personal, accusational



Gimme an A! = Perform an Analysis

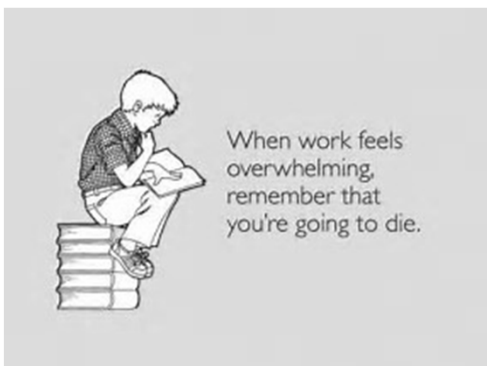
- You've determined a root cause, how widespread is it?
 - One person? One department? Even bigger?
- How many beneficiaries did it affect?
 - Perform a Beneficiary Impact Analysis (BIA)
- What issues arise in performing the analysis?
 - Accuracy
 - Time constraints



Gimme a P! = Plan formulation to fix issue

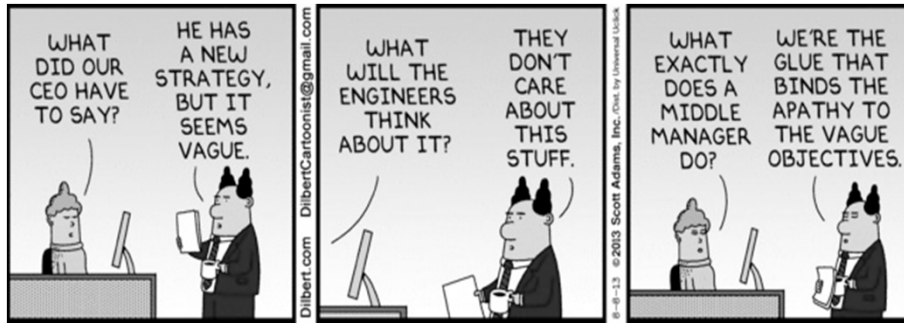
- What steps to take?
- Getting the right people involved (business owners) and invested from the start.
- Identify a main contact as business owner for the entire CAP.
 - Important when multiple areas are involved
 - Signoff from all areas involved
 - When CAP is being formulated
 - When CAP is being considered complete
- How long do you leave your CAP open?
 - Issues with too short, and too long

What could possibly go wrong?



- Lack of oversight for CAP
- Lack of resources
 - Can be problematic for small companies
- No movement from (middle) management

Middle management struggles



Middle management struggles (cont.)

- Middle Manager - the title says it all!
 - This assignment is not for the faint of heart
 - Need to keep bosses satisfied and subordinates engaged

- Critical participant in the determining strategies for addressing deficiencies identified in CMS program audit.
 - Charged in implementing remediation efforts and evaluating their effectiveness in closing those gaps

Strategies for Success with Managers

- Review audit findings and what is needed in order to clearly demonstrate compliance.
- Help middle managers understand the role they play in determining best remediation strategy to close performance gap.
 - Challenge “the way it’s always been done” by exploring new approach.
- Middle managers/supervisors typically have the most credibility among employees.
 - Get them to understand and support the process of refining how people and processes will be reshaped in order to achieve compliance.
- Build communication structure to disseminate messages throughout CAP development, implementation and evaluation.
 - This needs to be a “safe zone” – don’t punish the messenger.
 - Middle managers must be able to communicate challenges; bring recommendations or adjustments needed to progress.

Adding a “Prevention” Paradigm Through a Bottom Up Controls Evaluation Approach

- Recognizing that Compliance happens or doesn’t at the bottom of the organization.
 - Daily, in each Business Unit
- Bottom Up reviews focus on evaluating whether there is sufficient “real-time” knowledge, information and tools at the Business Unit level.
 - Allows for proper handling and reaction at the front line for each specific regulatory requirement
- Focus on breaking down requirements and looking for controls
 - Foundational resources (staffing, training, SOPs, desk procedures)
 - Necessary data capture and data flow (end-to-end, intra-department)
 - Implemented process controls and tools (work process queues and reporting on cases at all stages)

The Bottom Up Approach In Focus

- Focuses on evaluation and testing of whether there are front line tools and controls sufficient to allow business owner to manage to regulations, and identifies control gaps and risks.

- Business unit / business process focused
 - What controls are needed
 - What processes and data flows exist
 - How to arm business owner to address compliance in real time



What is CMS Looking for in Your CAP?

- Did you perform a root cause analysis?
 - How was it done?
 - What steps were taken?

- Did you address the issue with management?

- Did you perform a BIA?
 - Did you make it right for affected members?

- Do you have documentation to back up your completion?

- Have you done subsequent auditing/monitoring?

Adjusting Compliance Risk Assessments and Corrective Action Plans

- Risk Assessments rarely discuss business unit level process control gaps to be closed.
- CAP plans ACG typically sees cover elements such as:
 - Staff volume, recruiting, training
 - Systems data issues
 - New oversight and monitoring
 - Do not typically address prevention controls and what happens if triggers
- Corrective Action Plan models used can vary widely.
 - Use a standard CAP model for all business units:
 - Assures business owner addresses the various controls required
 - Triggers actions to be able to manage area to compliant operations

CAPs When Working with FDRs

- Size Matters – the larger the FDR, the more difficult it may be getting them to work with you.
- It's not me, it's you – having them admit there is an issue can be frustrating.
- Be aggressive – stay on top of their progress.
- Recruit others in your health plan that may have a different contact within the FDR organization.



The Traditional Approach to Delegate Monitoring and Auditing

- “Watchdog”
- “Policeman”



The Dynamic Approach to Delegate Monitoring and Auditing

- “Consultant”
- “Catalyst”



How is Dynamic Delegation Different from Traditional Delegation Oversight Models?

- **Traditional models for delegation oversight:**
 - Watchdog – idea that a comprehensive, delegate oversight program will provide the plan with the necessary information to clearly monitor performance.
 - Policeman – implement formal corrective actions to avoid negative consequences in the future.
- **Dynamic Delegation model:**
 - Consultant – idea that a collaborative relationship with delegates should reduce or eliminate the need for formal corrective actions.
 - Catalyst – focusing on continual evaluation, training, communication and re-evaluation.

A Successful Delegation Relationship

- **Collaboration** – Become a partner with your delegates
 - Establishing mutual goals to “Get It Right”
 - Share data and metrics
- **Customization** – Know the unique processes and challenges of your delegates
 - IT Systems
 - Process Flows
 - Training Methods
- **Education** – Teach your delegates to become experts
 - Create and share tools vs. leaving the delegate to figure it out
 - Train staff on file presentations to support audits – and practice

A C-A-P for Your CAP

- **Completion –**
 - Finalize your documentation
 - Report back to your leadership of accomplishment
- **Audit/Monitor**
 - Should be done shortly after CAP completion
 - Identify if fix is working or any residual issues
- **Perfect**
 - Work with team to clean up any minor issues
 - Tweak if previous CAP is found to be defective ☹



Questions

- What's for lunch?

Thanks for your attendance!

Contact Information

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