

# CMS Mock Program Audits

## Best Practices and Strategies for Your 2020 Program Year

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Alexander Henrichs & Ann VanBoxtel

# About The Burchfield Group, An Aon Company

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# Presenters

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Alexander Henrichs, CHC, CPhT  
Auditor

Mr. Henrichs specializes in Medicare Part C & D compliance audits and consulting for regulatory requirements. Additionally, Alex assists with CMS data validation audits & Medicare and commercial claims audits.



Ann VanBoxtel, PharmD, RPh  
Clinical Auditor

Dr. VanBoxtel specializes in Medicare Part C & D compliance audits and clinical oversight of other audits, such as the Fraud, Waste, and Abuse audit.

# Objectives

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- Background of CMS Mock Program Audits
- Advantages of Participating in a Mock Audit
- Preparation for a Mock Audit
- Common Pitfalls to Avoid
- Best Practices
- Pros/Cons of Using an External Consultant
- Updates on Program Audits From the 2019 CMS Fall Conference
- Questions & Answers

# Background

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- Program Audit = Audit of Part C & D Benefit administration, currently using 2017 Audit Protocols posted on cms.gov
- CMS has been conducting Program Audits since 2010 to ensure that Medicare Advantage and Prescription Drug Plans are in compliance with program requirements
- Audit engagement letters sent ~March-July
- Scope may include up to 7 elements
- Audit results (depending on performance) can lead to civil monetary penalties, sanctions, or termination of contract – also may impact STAR ratings

## In 2018

- 39 Sponsors audited – approximately 2/3 had <15,000 lives
- Average audit score = 1.03
- 10 Civil Monetary Penalties + 3 Sanctions imposed
- In 2019
- New audit cycle
- Word on the street - large plans audited, enrollment sizes >250,000
- In 2020...?

# Advantages of Participating in a Mock Program Audit

- Excellent "practice" for an actual CMS audit
  - Logistics
  - Timelines
  - Speaking/Answering Questions during Webinar
  - Roles/Responsibilities
  - Post-audit follow up items
- Identify weaknesses in processes that may result in non-compliance
  - Respond with corrective action plans (CAPs) as part of the practice
  - You can disclose non-compliance you are working to correct
    - Or have all issues corrected by the time you receive a CMS audit notice and have confidence in your compliance effectiveness
- Evaluate current processes
  - Adopt best practices



# Preparation for a Mock Audit

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- Review CMS Audit Protocols in detail
- Assign roles – who will lead each element
- Coordinate a kick-off date, kick-off meeting with the lead auditor
  - Distribute/respond to initial document request list
  - Pull universes
  - Test universes for Data Integrity
- Coordinate scheduling of webinars
- Brief your team & SMEs (and vendors, if needed) on what to expect – have everyone you need scheduled to be in the room or available via phone for questions
- Review samples for webinar walkthroughs upon receipt
- Assign roles – taking notes, pulling up supporting documents when questions arise
- Expect to spend a significant amount of time on the entire process from start to finish – also expect to learn and gain experience from this process



# Pitfalls to Avoid



- Waiting until the last minute to pull universes
- Not preparing your First Tier, Downstream and Related Entities to participate in the mock audit
- No sample walkthrough practice before the webinar
- Showing more than is requested by not pausing the screen
- Forgetting to mute the audio when carrying on an internal conversation
- Waiting until the day of the webinar to test technology or not having technical support during the webinars
- Attempting to hide or cover up non-compliance
- Answering questions the way you think auditors would like to hear vs what is actually happening in your organization
- Submitting follow up items late without notifying the auditor ahead of time that you may not meet the deadline



# Best Practices

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- ✓ Follow the protocols
- ✓ Identify roles and responsibilities
- ✓ The speaker should be the only one talking and responding to questions from the auditor
- ✓ Do not self-disclose additional information not related to specific questions from your auditor.
- ✓ The driver and speaker should be proficient at managing the “pause” and “mute” buttons, respectively
- ✓ Do not argue with the auditor – the auditor is not always right, but the webinar is not the forum to debate.
- ✓ Issue resolution should go through the Compliance Officer with the Audit Project Lead
- ✓ Follow up with findings like you would in an actual program audit
- ✓ This is an opportunity – not a punishment

# Pros & Cons of Using An External Auditor

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## PROS

- We strive to make the audit experience as similar as possible to what you'd experience with CMS
- We have an experienced team with a diverse perspective
- "Fresh Eyes" to see issues that may be overlooked internally due to familiarity
- We can scale cost based on scope of the Mock Audit
- Partnership & consultative approach – we want you to be prepared for the actual audit
- Less strain on internal resources

## CONS

- It's not free
- If we discover an issue you and you decide not to fix it – will add risk
- Added pressure of an outsider looking at your operations/processes



# Updates on Program Audits From the 2019 CMS Fall Conference

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# Q&A

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Thank you for joining us today!

Questions?

Contact us:

Alexander Henrichs – [ahenrichs@burchfieldgroup.com](mailto:ahenrichs@burchfieldgroup.com)

Ann VanBoxtel – [avanboxtel@burchfieldgroup.com](mailto:avanboxtel@burchfieldgroup.com)

If you are interested in a Mock Program Audit or other Medicare Part C & D Compliance related service, contact:

Kristin Gray – [kgray@burchfieldgroup.com](mailto:kgray@burchfieldgroup.com)

Terri Poindexter – [tpoindexter@burchfieldgroup.com](mailto:tpoindexter@burchfieldgroup.com)