



# CMS Program Audit Readiness



## **Welcome to CMS Program Audit Readiness!**

This training has been developed to provide guidance to First Tier, Downstream, and Related Entities (FDR) on the required activities for CMS Program Audits.

In order to oversee and monitor its Medicare Advantage plan sponsor contractors, CMS performs “Program Audits” to assess how sponsors are administering the program.

As a First Tier, Downstream and Related Entity, you play a critical role in ensuring compliance with this process. Because of the intensity of the Program Audit process, this training has been designed to help you prepare and gain insight into navigating the audit process.

# About this Audit Training

As we continue to prepare for a **CMS Program Audit**, it is really important that we do two things: **(1) ensure that our FDRs are operating compliantly, and (2) make sure that the FDR audit representatives who will be participating in the Audit are well prepared and equipped to succeed.** Whether you're a presenter, a navigator, a researcher, or some other participant, you will play a key role. We'll have a successful Audit if we have good case history to deal with and we can demonstrate our proficiency at handling our Medicare responsibilities.

This training is designed to ensure that each person who will have a role in supporting the Program Audit has a solid understanding of what will be expected and how we plan to conduct the Audit, so that we can be best positioned for a successful outcome.

Thank you very much for taking part in this important training and helping to ensure that **WE** are ready when CMS comes calling.

## FDR Business Operations

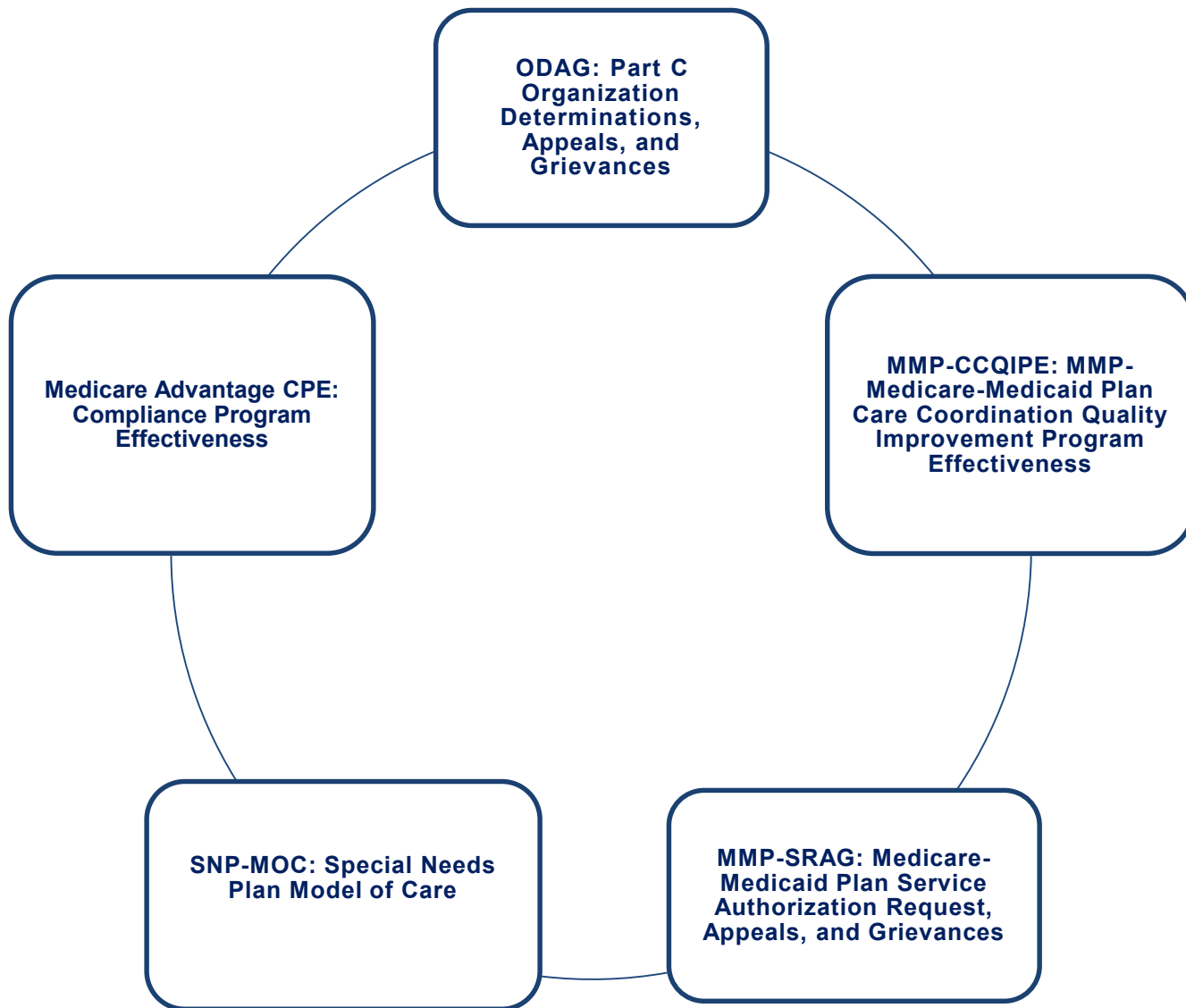


"To use a theater analogy: in order to be sure that every actor/actress and supporting staff in a production are **"stage ready"** for the moment when the curtain goes up, it is crucial that the entire team rehearse, know their **"cues"** and be ready for the unexpected!"

Tom Young  
*Medicare Compliance Officer  
Cigna Medicare Advantage*

# Program Areas to be Audited

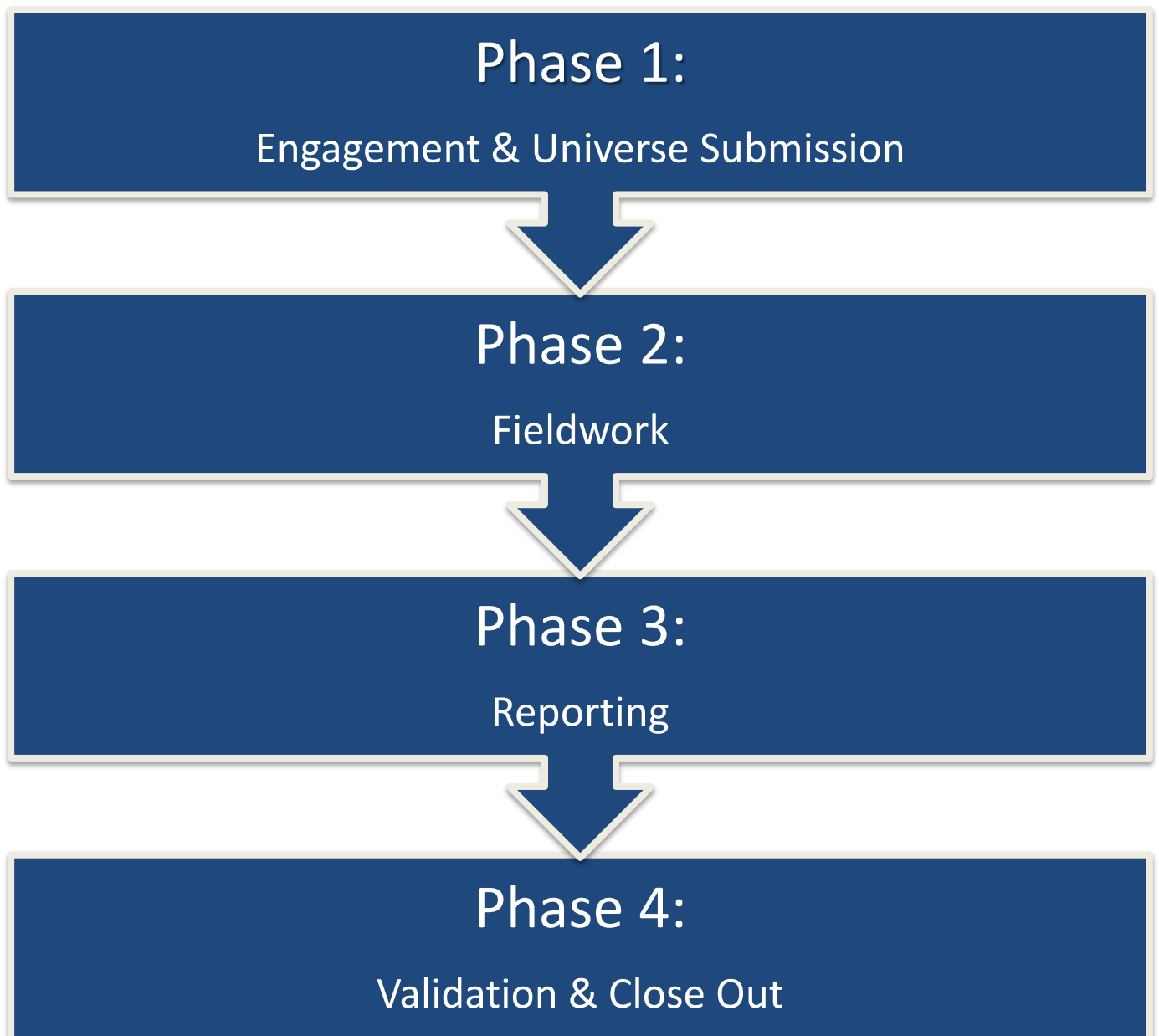
CMS performs “Program Audits” to assess how Medicare Advantage sponsor contractors provide oversight, monitor, and administer the Medicare program. The CMS Program Audit will assess the program areas outlined within the diagram. FDRs will only participate in CMS Program Audit(s) for the programs they are delegated for.



# Audit Phases

*Be Audit Ready All the Time*

*FDRs will be engaged in the CMS Program Audit phases outlined below.*



# Audit Phases

*Be Audit Ready All the Time*

*FDRs are engaged in each of the audit phases outlined below. Review each phase to learn of required FDR actions.*

## Phase 1a: Engagement

- CMS Engagement Notice sent to Cigna Compliance of upcoming audit. The notice will contain key dates, program audit areas, universe requests and deliverables due to CMS for the Program Audit.
- FDR to receive notification of planned CMS Program Audit. FDRs will be required to submit complete and accurate universe(s) for the time period requested in the CMS Engagement Notice.

## Phase 1b: Universe Submission

- Universes must be submitted to CMS within 15 business days of the Engagement Notice. Therefore, FDR universe teams must be prepared to act without delay and ensure their efforts are efficient and well-coordinated. Cigna's expectation is for the FDR to submit their universe files within 72 hours of request.
- Cigna will run the FDR universe through the Compliance universe rules engine to identify universe data errors. If errors are found, Cigna will communicate the universe data errors to the FDR. Cigna expects the FDRs to investigate the errors, make corrections to the universe and resubmit a new corrected universe within 48 hours of receiving the notice from Cigna on the universe data errors.
- FDR primary audit contact will be required to attest that the universe(s) submitted are complete and accurate.
- Universe Integrity Testing – Within five business days of receipt of universes, CMS auditors will conduct a webinar with Cigna to verify that the dates and times provided in the CDAG, ODAG, and/or SARAG universe submissions used for calculating timeliness are accurate.
- CMS will notify Cigna Compliance of the sample selection for the program audit **approximately 1 hour before the start of the onsite live audit. The Onsite Live Audit will be virtual in 2021.**
- BRMs will inform selected FDRs of the scheduled time to join the virtual live audit sessions. **FDRs should arrive timely with their audit team ready to engage.**
- CMS conducts an extensive review on the universe submission and supporting documentation provided on the FDR source system(s) to ensure accurate data validation.

# Audit Phases

*Be Audit Ready All the Time*

*FDRs are involved in each of the audit phases as outlined below. Review each phase to learn of required FDR actions.*

## Phase 2: Fieldwork

- Transaction Testing – CMS will conduct detail transaction testing of cases from each of the universes and review supporting documentation for how the utilization management and claims are processed
- CMS will notify Cigna Compliance of the sample selection for the program audit **approximately 1 hour before the start of the onsite live audit. The Onsite Live Audit will be virtual in 2021.**
- BRMs will inform selected FDRs of the scheduled time to join the virtual live audit sessions. **FDRs should arrive timely with audit representatives ready to engage.**
- CMS reviews sample transactions and supporting documentation provided to the FDR source system(s) for accurate processing validation.

## Phase 3: Reporting

- BRMs to host post-audit debriefing to discuss next action steps.
- Root cause analysis (RCA) and Impact Analysis (IA) must be submitted for any non-compliance identified as requested by CMS auditors. BRMs will work with FDRs that have outstanding deficiencies requiring RCA or IA.
- Immediate Corrective Action Required (ICAR) – ICARs are required if CMS identifies systemic deficiencies during an audit that are so severe that they require immediate correction. FDRs will be required to submit Corrective Action Plans (CAPs) to the BRM to describe the actions taken to stop the non-compliance within three business days of being informed of the ICAR condition.
- Corrective Action Required (CAR) – Corrective Actions are required if CMS identifies systemic conditions during an audit that must be corrected, but the correction can wait until the audit report is issued. CAR Corrective Action Plans (CAPs) must be submitted within 30 calendar days from the issuance of the final audit report.
- Audit reporting: CMS issues the final audit report.

## Phase 4: Validation & Close Out

- FDRs will have limited engagement unless required reporting is requested from CMS to address noted deficiencies.
- CMS validation and close out- This is the longest phase as it occurs over a period of approximately six months. Cigna, along with its partners, must demonstrate to CMS that it has corrected any non-compliance that was identified during the program audit prior to audit close out.

# Key Audit Roles

*Be Audit Ready All the Time*

In preparation for the Audit, FDR Business Operations have worked with you, our partners, to create a roster of FDR representatives who will present cases, facts and documentation to CMS.



Designated FDR representatives will present cases/documentation and perform functions such as driving the screens during live webinars with CMS, serving as back-up to the primary presenters, as well as assisting with gathering information as needed.

These key FDR representatives (collectively: presenters, drivers, back-up, runners, researchers, SME's, scribes, Compliance team member support, etc.) are captured on a roster maintained by the FDR Business Operations department to ensure we are best positioned to succeed in the course of the Audit.

# Key Audit Roles

*Be Audit Ready All the Time*

*Below is a general overview of the audit support roles required during the CMS audit. Review and ensure your organization has a representative selected for each audit role.*

## Primary Speaker (May defer if needed)

- Answers questions from CMS and are typically the Subject Matter Expert (SME) for the topic being reviewed

## Driver

- Navigate the systems via Webinar screen-share demonstrating the different systems as needed.
- This person should have access to all required applications

## SME Support

- Can be another employee who plays a key role in the overall process and may be needed for specific details
- Includes clinical experts such as a Medical Director for questions specific to clinical decision-making, for example
- Includes a Data or IT SME for any data or technical questions

## Researcher/ Back-up driver

- Researches during sessions outside of Webinar
- In the event the "Driver" is not available; this resource could drive the session

## Runner/ Communicator

- Acts as go-between for questions or items required during the session.

## Universe Escalation Team

- Submission and clean up of universes for audit.



# FDR Expectations

The intensity of the Program Audit process requires several preparation activities to include data validation, mock audits, and practice webinars. Preparation activities will require attendance and support from designated FDR audit representatives.



## Helpful Reminders

- Your Business Relationship Manager will schedule mock audit/data validation sessions with your organization, to include the support of Cigna Compliance staff. Designated FDR audit staff are required to attend from your organization.
  
- Every FDR is responsible for ensuring his/her computer is able to connect to the webinar and access the appropriate systems. FDRs should resolve technology issues immediately by contacting their IT department and reporting issues to their assigned FDR Business Owner and FDR Business Relationship Manager.
  
- All FDR representatives should ensure their responses to CMS are fully accurate. FDR representatives should not speculate when responding to CMS.
  
- Despite our best preparations, the unexpected will happen. This could include unanticipated connectivity issues, background noise or other distractions. Prepare for the unexpected and be flexible as needed.
  
- It is every FDR representative's responsibility to treat our CMS Audit colleagues and CMS contractors with the appropriate level of respect.

# Successful Webinars Tips

## Audit Expectations

In many ways the Do's and Don'ts of a successful audit experience are commonsense and intuitive. The following expectations are critical to the success of the audit. Read each statement and adhere to the audit expectation.

### DO'S

Drivers should be sure email & online communication notifications are turned off

Announce your name prior to responding to a question in CMS webinars

Be prepared to receive and review samples one hour prior to the webinar

Stay on mute unless you are speaking

Stick to the facts, and only answer the question that is asked by the auditor

Have WebEx® call you to avoid unknown caller issues

Remember to add 'the FDRs name' after your name when logging into WebEx

Capture questions you don't know the answer to & take back for further research

Login to all scheduled webinars at least 10 minutes prior to the start of call

Only respond to questions in which you are 100% sure you know the answers.

### DON'TS

Offer a "good faith" guess when asked a question

Elaborate on answers regardless if the auditor asks you to do so