

Managed Care Compliance Conference

Regulatory Reports and Submissions Just What Are You Sending Your Customer?

**Breakout Session 201
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1

Regulatory Reports and Submissions

- **Why is this important?**
- **Purpose and Function**
- **Risks of Non-Compliance**
- **A Systematic Approach**
- **The Challenges**
- **Measurement**
- **Problem Situations / Unique Reports**
- **Scenarios**



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2

Self-Assessment

Where are you on the scale?

1 2 3 4 5 6 7 8 9 10

- | | | |
|--------------------------|---------------------------|---------------------|
| - No review | - Inconsistent review | - Scheduled reviews |
| - Backlog of reports due | - Inconsistent timeliness | - Timely submittals |
| - No oversight | | - Systematic |



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3

Why Is This Important?

- **Obligation - contract or legal requirement**
- **You signed the contract. You applied for the plan licensure**
- **It's The Customer! And the client is always right.**
- **The reports contain valuable information**
- **Company Image and Reputation**
- **Certifications / Warrants / Attestations**
- **Many risks for non-compliance (Could be a ticking time bomb!)**



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4

Purpose and Function

- **Documents Performance of Services**
 - **Justifies payment (Otherwise it could be fr__d)**
- **Measures Performance**
- **Assures Value of Contract**
 - **Political document**



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5

Risks of Non-Compliance

- **Sanctions / Fines / Damages**
- **Enrollment Suspension**
- **Denial of Service Area Expansion**
- **Termination of Contract**
- **Revoke or Suspend Licensure / Accreditations**
- **Company Image and Reputation**



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6

A Systematic Approach

1. Program established and supported by senior management
2. Designated responsibilities
3. Tracking / Logging / Scheduling
4. Review and documented approval of reports
5. Measure reporting performance
6. Discuss with regulator
7. Use reports / trends
8. Procedures for special or problem situations
9. Report storage



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7

Challenges

- **Support from Stakeholders:**
 - Senior management
 - Report ownership and responsibilities
- Systems limitations or programming costs
- Conflicts with or duplicates existing reports
- Problems and unique situations
- Tracking and storage
- Changes in systems
- Changes in personnel (owners / IT)



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8

Measurement of Reporting Performance

- **Inventory of all reports and submissions**
- **Set goal and measure against that goal**
- **Gap against the customer client requirements**
- **C.A.P. to improve where needed**
- **8 Business Day Rule**
- **Preliminary Report* / Review / Correct / Submit**
- **Track monthly**
- **Assess the Report / Trends**
- **Get Feedback from Your Customer Client**



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9

Special Situations

- Reports due immediately after reporting period ends
- Electronic file submittals – no prior review.



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10

Scenario I

- Q - What do you do if you know a report, which is due shortly, has major inaccuracies and cannot be corrected in time?
- A. Submit it on time, even if it is wrong, and beg for forgiveness if the regulator later questions it.
 - B. Don't submit it until it is correct.
 - C. Contact the regulator and inform them of the situation, and request an extension.



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11

Scenario II

- Q - What do you do if you know a report, which is due shortly, has minor or partial inaccuracies or is incomplete and cannot be corrected in time?
- A. Submit it on time and beg for forgiveness if the regulator later questions it.
 - B. Don't submit it until it is correct.
 - C. Contact the regulator and inform them of the situation, and request an extension.
 - D. Contact regulator and offer submitting with a written qualification that the partial inaccuracy or incompleteness will be submitted later when corrected.



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12

Scenario III

Q - What do you do if you discover a report has been submitted with inaccuracies for the last eight months?

- A. Nothing, because the regulator has not questioned it.
- B. Ensure future reports are submitted correctly.
- C. Correct the prior reports and re-submit them.
- D. Contact the regulator and explain the situation and offer to correct and re-submit the prior reports.



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13

When Things Go Wrong

- **Problems:**
 1. Cannot make deadline
 2. Incomplete report
 3. Inaccurate report
- **Options**
 - ✓ Submit an incorrect and/or incomplete report on time
 - ✓ Submit a report that is late, incorrect, and/or incomplete
 - ✓ Submit a correct and complete report late
 - ➔ Obtain deadline extension from regulator
 - ➔ Submit report on time but with qualifications re: completeness and/or accuracy
- **Develop a Solution and a Timeline**
 - Alert the Customer Client (i.e., disclose)
 - Get approval for extension or incompleteness/inaccuracy in writing
 - Help Customer with their mission: Assure Value
 - Goals: Trust and Compliance



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14

Final Thoughts

- Audience Ideas
- Comments and Stories



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15