

Medicare Advantage Compliance & Oversight Overview

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Enhancements in Monitoring and Compliance

- Since June 2008, CMS has focused efforts to enhance:
 - Compliance/oversight activities
 - Data collection and tools to analyze data
 - Integration of Part C & D oversight activities
 - Communication/collaboration
 - Consistency
 - Transparency to stakeholders (internal and external)



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Oversight Strategy

- Paramount goal: Protecting Medicare beneficiaries enrolled in Part C/D plans and promoting efficiency and sustainability of Medicare program
- Foundation: Data-driven monitoring and quantifiable performance measures
 - Examples: CTM performance, Online Enrollment Center delinquent downloads, retroactive processing reports, IRE reconsideration reports, LIS Data Matching, Call Center Performance Monitoring
- Strategies designed and resources allocated based on assessment of risks
- Promote early alerts and consistent, prompt corrective responses at lowest level possible using a progressive compliance model where appropriate

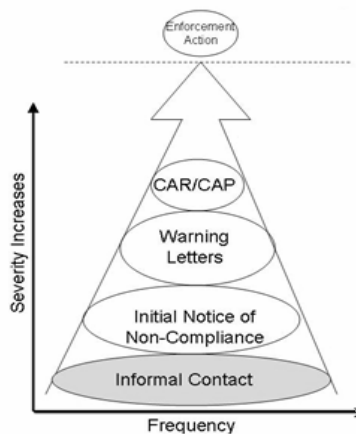
Oversight Activities

- Surveillance activities
 - Secret shopping of groups sales events and one-on-one appointments
 - Website review
 - Clipping service for unreported marketing events
 - Focus on non-renewal activity (NR)
 - Secret shopping in 55 markets with highest NR rates
 - Secret shopping of call centers for NR plans
- Daily monitoring by Regional Office Account Managers

Oversight Activities

- Complaint/information exchanges with State Departments of Insurance (DOIs).
 - Information sharing based on MOU includes:
 - Information related to specific agents/brokers
 - Consumer complaints
 - Information on CMS enforcement actions
 - Recent Partnership with Compliance and Enforcement (C&E) MEDIC
 - CMS establishing a State referral notification to provide status on pending MEDIC investigation of agents

Progressive Compliance Model



Compliance Activity

- In the last four months, CMS has issued:
 - 247 Notices of Non-Compliance
 - 149 Warning Letters
 - 17 Ad-hoc Corrective Action Requests
- These compliance letters are the result of
 - Data-driven performance assessment,
 - Surveillance activities, or
 - Violations discovered through daily monitoring activities by Regional Office account managers

What's On the Horizon?

- Continued focus on data driven oversight and targeted monitoring
- Focus on consistency in compliance across CMS components and the 10 Regional Offices
- Expansion of surveillance activities into other operational and program areas

QUESTIONS?

