



# WHAT YOU NEED TO KNOW ABOUT THE 2018 CMS PROGRAM AUDIT PROTOCOLS

The Centers for Medicare and Medicaid (CMS) has reduced the number of calls required for the call log universes, added an extra week for Compliance Program Effectiveness (CPE) audit preparation, suspended the Medication Therapy Management (MTM) pilot audit, and updated the Medicare-Medicaid Plan (MMP) protocols for the MMP audit elements that are now a fully operational part of the 2018 CMS program audits.



## MTM SUSPENDED

While CMS has suspended the Medication Therapy Management (MTM) area from the 2018 program audits, CMS is continuing to review data gathered from the previous two years. Plans should continue to monitor their MTM processes, in the likely event that this area resurfaces in future program audits.

## CDAG/ODAG CALL LOG UNIVERSES REDUCED

CMS has reduced the CDAG/ODAG Call Log universes to 3-10 days of calls, depending on enrollment:

- Less than 50,000 enrollees = 10 days of calls
- 50,000 – 249,000 enrollees = 7 days of calls
- 250,000 or more enrollees = 3 days of calls

## CPE PREPARATION EXTENDED

CMS has added an additional week to their field work, increasing the audit weeks from 2-3, to allow plans more time to prepare for the Compliance Program Effectiveness (CPE) on-site audit. CMS will audit the operational program audit areas, such as Formulary Administration (FA); Coverage Determinations, Appeals and Grievances (CDAG); Organizational Determinations, Appeals and Grievances (ODAG), and Special Needs Plans-Model of Care (SNP-MOC), during Week 1 of the audit. CMS will use Week 2 for overflow, if there are 5 or more areas to be audited, which would include the MMP-Care Coordination and Quality Improvement Program Effectiveness (MMP-CCQIPE) and MMP-Service Authorization Requests, Appeals and Grievances (MMP-SARAG) areas, if applicable.

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With over 150 mock audits and onsite CMS audit support projects under our belt – and counting – BluePeak’s expert consultants can help your team prepare for a 2018 CMS Program Audit or provide behind-the-scenes help during an actual audit. BluePeak’s experience isn’t limited to mock audits and audit support. We’ve also conducted CMS and mock validation audits, worked with clients to get CMS sanctions removed, helped with remediation and more.

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# 2018 SHAPING UP TO BE A BIG YEAR FOR MMP AUDITS

## CMS REMOVES MMP AUDIT PILOT STATUS AND RELEASES 2018 MMP AUDIT PROTOCOLS

CMS RELEASED TWO KEY PIECES OF MEDICARE-MEDICAID PLAN GUIDANCE IN DECEMBER 2017:

- 1** The MMP program areas, that were piloted in 2017, will be fully operational in 2018, and
- 2** CMS made some minor changes to the MMP audit protocols.

### WHAT DO I NEED TO KNOW?

MMP Service Authorization Requests, Appeals and Grievances (SARAG) and Care Coordination Quality Improvement Program Effectiveness (CCQIPE) findings will now be factored into the overall audit score calculation.

MMPs should refer to the 2018 MMP Audit Protocols, released December 21, for all changes to SARAG and CCQIPE universe record layouts. Some of the minor revisions CMS made to the MMP protocols to clarify existing content and/or to align with other program areas include:



### SARAG

- Updated to include service authorization requests initiated by service coordinators or care coordinators in the Standard Service Authorization Requests (MSSAR) and Expedited Service Authorization Requests (MESAR) universes.
- Clarified that provider payment requests will be included in the universe integrity webinar that is used to verify the accuracy of the dates and times provided in the record layouts. However, the Claims universe will continue to be excluded from the SARAG timeliness calculation.
- Removed the New York and California specific columns in the MSSAR and MESAR universes.
- Reduced the MMP Call Logs universe review period to 10 days of calls.



### CCQIPE

- Clarified that Model of Care documents are no longer required audit documentation.
- Updated ICT compliance audit element 3.3.2 to clarify that the focus of the compliance standard is whether the ICT members possess the training required per the 3-way contract.

Sources: "CY 2018 MMP Audit Protocol Updates," HPMS memo, December 21, 2017; "2018 Program Audits," HPMS memo, December 6, 2017



## ARE YOU READY?

CMS began sending audit engagement letters to plans in March. Are you ready? BluePeak can help you prepare by conducting a Mock MMP Audit, utilizing the 2018 MMP Audit Protocols. We can also provide support during an actual MMP audit. **Contact us today at 469-319-1228 or [info@bluepeak.com](mailto:info@bluepeak.com)**



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