

CMS Universes: Using Regulatory Data Sets to Provide Monitoring and Oversight to Inform Decision Making

February 3, 2021



1

Agenda

- 1 Introductions
- 2 Industry Observations: CMS Oversight
- 3 Establishing an Operational Compliance Universe Monitoring Program
- 4 Methods and Results
- 5 Q&A
- 6 Contact Us
- 7 Key Automation Features



Source: XKCD.com "Incident"

CMS Universes: Using Regulatory Data Sets to Provide Monitoring and Oversight to Inform Decision Making
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2

1

Introductions

3

Presenters



Melissa Hecht
AVP, Operational Resiliency; Business
Continuity Director
Healthfirst



Adam Zeldin
Healthcare Compliance & Analytics
Manager
PwC

4

2

Industry Observations: CMS Oversight

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5

5

Industry Perspective: CMS Oversight Practices

CMS auditors have been continually **enhancing how they evaluate compliance and performance** related to members' access to medical services, drugs, and other beneficiary protections

- **ODAG / SARAG** – we see a continued emphasis on members' timely access to care, including focus on Appeals overturn rates and rationales; case classification; MMP contracts are evaluated at the contract level for timeliness purposes; given access to care considerations during COVID, we anticipate heightened review of prior authorization requirements within UM (e.g., IFED care)
- **CDAG / FA** – multiple related data points within the Part D program area universes give CMS a broader picture of the member impact of potential compliance issues
- **SNP MOC / CCQIPE** – we observe movement toward an evaluation of member-centric compliance and increased focus on outcomes and effectiveness rather than completion of discrete care management activities
- **CPE** – CMS is evaluating how well compliance is achieved within functions outside of Compliance (e.g., the Business)

6

3

Establishing an Operational Compliance Universe Monitoring Program

7

Successful operational monitoring programs start with the production of **high-quality and submission-ready universes** while enabling **operational and compliance monitoring**

Illustrative analytics lifecycle of a CMS data universe

1. Data Cleanliness

Identification of missing values or basic anomalies (e.g., field type, field length). Assessment application can also help you accelerate the universe production process.

2. Data Gaps

Review data interdependencies, inconsistencies, and abnormalities.

3. Source Validation

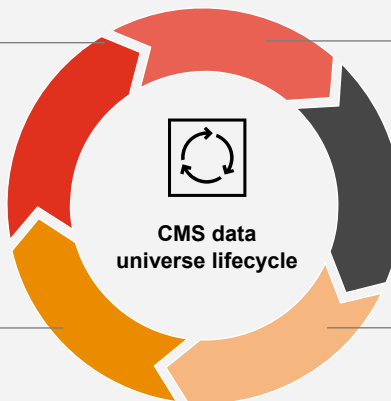
Review universe date/time fields for logical sequencing and operational patterns against data sources.

4. Operational Compliance

Analyze processes for compliance with regulations, with focus on CMS priority areas.

5. Operational Performance

Apply metric results to diagnose issue and identify potential root causes of operational deficiencies.



8

Leading practices in using CMS Universes for operational and compliance monitoring



Provide ongoing access to data from relevant data sources to meet the reporting needs for stakeholders monitoring operational performance and regulatory compliance

- **Regular production of universes** (ideally not less frequent than monthly) **from each delegate and department** can help provide this clear picture across business units, geographic regions, contracts, and third-party delegates and vendors



Apply a custom-tailored set of business rules to test against organization-specific policies and processes

- While many logical and quality tests are driven by CMS requirements and experiences, **business logic should reflect your practices** to reduce false positives (e.g., vendor-level mail policies, call center hours, effectuation processes)



Define clear roles, responsibilities, and governance for testing and remediation of findings

- **Remediation** of data quality and accuracy gaps **is critical** for accurate reporting/trending of operational and compliance performance
- Likewise, **define clear processes** to address and resolve operational deficiencies and compliance gaps identified
- **Executive buy-in** is necessary for the success of an enterprise-wide program

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9

Common pitfalls with a CMS universe monitoring program



- **Delegated groups unwilling to provide data** on a regular cadence can negatively impact an organization's ability to regularly review critical business and compliance processes



- **Incomplete feedback loops** can leave issues unaddressed while some nontrivial review activities are still being performed



- Processes with little oversight or organizational visibility are **suspended or terminated** when more urgent issues arise



- **Non-standard or poorly documented review process** can rely on individual knowledge exposing risk during employee turnover or during review reproduction. Certain risks may be addressed in one area but active in another.

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10

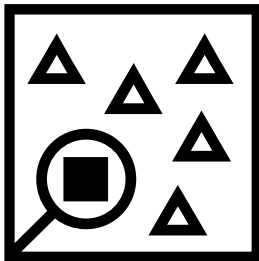
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Operational Compliance Universe Monitoring Program: Methods and Results

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11

11



***Monitor yourself the same way
CMS will review your
operational performance...***

12

By using automated universe analysis to perform operational and compliance monitoring, Healthfirst has improved performance in these areas



- **More detailed review with less effort** due to automated analysis



- **Reduced effort relating to regulatory and protocol updates** due to managed ruleset



- **Higher data quality** from regular review and ongoing feedback loop



- **Improved operational performance** from vendors due to compliance feedback loop and from individual departments due to compliance rules

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13

How Healthfirst uses the automated tool to perform operational compliance monitoring with universes

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14

How Healthfirst uses the automated tool to perform operational compliance monitoring with universes

Result Details

PROGRAM AREA: ODAG
UNIVERSE: S00
UNIVERSE PERIOD: 09/01/2020-09/30/2020
UNIVERSE CREATION DATE (MAXIMUM EXPECTED DATE): 10/09/2020
UPLOAD USER: Adam Zeldin
UPLOAD TIME: 10/09/2020 2:44 PM CST
RECORD COUNT: 20
NUMBER OF RECORDS WITH ANY COMMENT: 20
NUMBER OF UNIQUE COMMENTS: 14
FILE NAME: 2017 ODAG_S00_Demo_July_2018 copy.xlsx
NOTES: Notes
PROJECT TYPE: Monitoring - Monthly

Records: 10 | Add To Issue | Create Issue

Category	Comment	Results	Action
INTEGRITY	Record falls outside of audit period	20	View Detail
INTEGRITY	Contract ID is valid but Plan ID is not valid for Contract ID according to list received	6	View Detail
CONSISTENCY	Request Disposition is Denied but Date service authorization entered/effectuated in the sponsors system is not NA	6	View Detail
CONSISTENCY	Request Disposition is Denied but Was the request denied for lack of medical necessity? is not Y, N	6	View Detail
CONSISTENCY	Was a timeframe extension taken? is Y but if an extension was taken, did the sponsor notify the member of the reason(s) for the delay and of their right to file an expedited grievance? is not Y or N	3	View Detail
CONSISTENCY	Request Disposition is Approved but Date of sponsor decision is NA	2	View Detail
SEQUENCING	Date of sponsor decision is before Date the request was received	2	View Detail
SEQUENCING	Date service authorization entered/effectuated in the sponsor's system is before Date the request was received	2	View Detail
VALIDITY	Request Disposition is not a CMS-prescribed value of APPROVED, DENIED	2	View Detail
FORMATTING	Date the request was received is not in CCYY/MM/DD or valid format	1	View Detail

Showing 1 to 10 of 14 records

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Healthfirst staff identify process gaps, timeliness results, and data anomalies with record-level drilldown

15

How Healthfirst uses the automated tool to perform operational compliance monitoring with universes

Result Details

PROGRAM AREA: ODAG
UNIVERSE: S00
UNIVERSE PERIOD: 10/01/2020-10/30/2020
UNIVERSE CREATION DATE (MAXIMUM EXPECTED DATE): 12/07/2020
UPLOAD USER: Adam Zeldin
UPLOAD TIME: 12/07/2020 1:10 PM CST
RECORD COUNT: 21
NUMBER OF RECORDS WITH ANY COMMENT: 21
NUMBER OF UNIQUE COMMENTS: 15
FILE NAME: 2017 ODAG_S00_Demo_July_2018 copy.xlsx
NOTES: Notes
PROJECT TYPE: Monitoring - Monthly

COMMENT | RECORDS | FOR | **TIMELINESS SUMMARY** | DECISION MAKING | NOTIFICATION

Add To Issue | Create Issue

Test	Total # of Universe Records	# Excluded	% Excluded	Total # Included	# Timely	% Timely	# Untimely	% Untimely
Decision Making	21	4	19.05	17	13	61.90	4	19.05
Notification	21	2	9.52	19	8	38.10	9	42.86

2 records

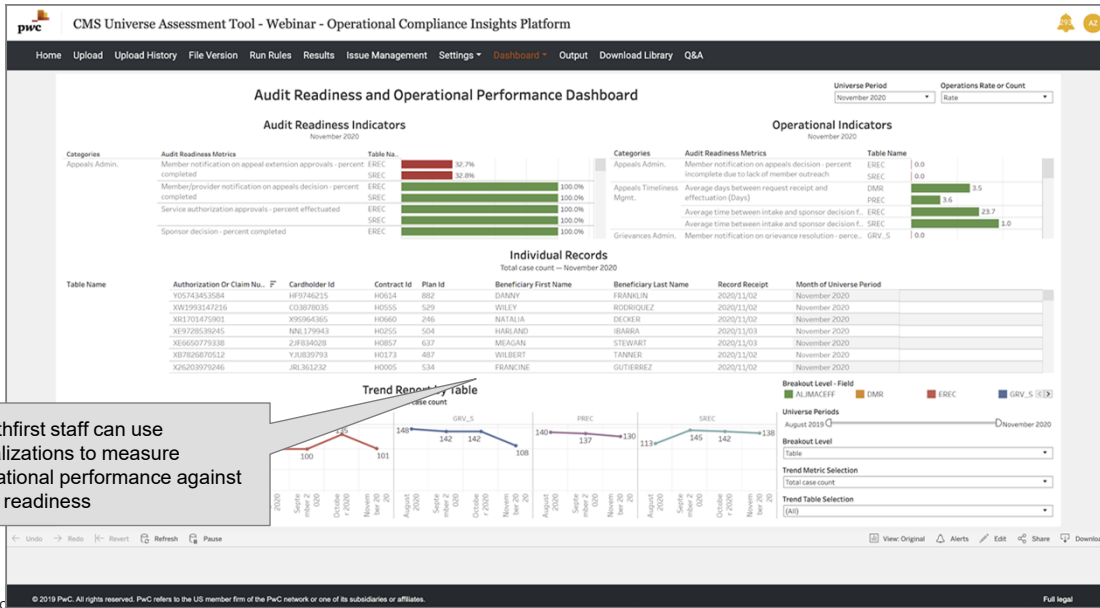
Showing 1 to 2 of 2 records

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Healthfirst staff identify timeliness results with record-level drilldown

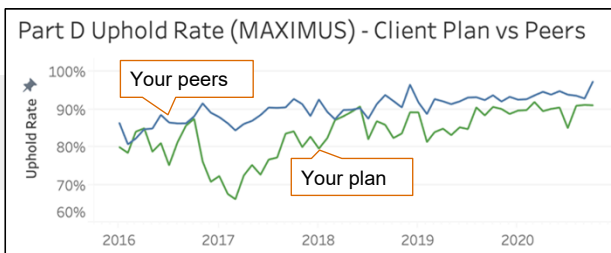
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How Healthfirst uses the automated tool to perform operational compliance monitoring with universes

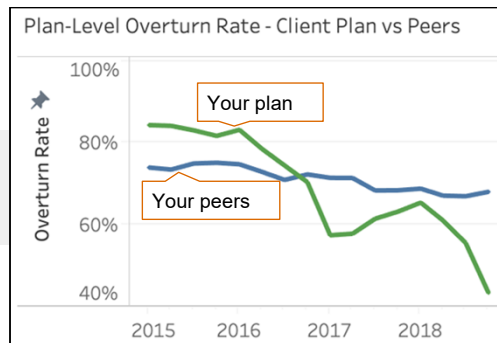
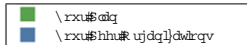


17

What's next? Continued plan monitoring and benchmarking leveraging other data sources



Example benchmark using IRE data



Example benchmark using Part C Data Validation PUF

18

Key takeaways from our experience

- ***Strong incentive for plans to establish universe monitoring programs if they haven't already***
- ***High quality monitoring starts with high quality data***
- ***Define clear monitoring program structure, roles, and responsibilities; executive buy-in and enterprise alignment***
- ***Automation has accelerated the work at Healthfirst allowing staff to focus more on resolution and remediation rather than data and reporting***

19

5

Q&A

20

6

Contact Us



Melissa Hecht
mhecht@healthfirst.org



Adam Zeldin
adam.zeldin@pwc.com

7

Final Takeaway: Key Automation Features

Key automation features addressing program monitoring needs



Data ingestion: Multiple users have the ability to upload large CMS data universes directly into a solution that scales across business units and team roles; or, enable integration with source systems to provide an ongoing review and continuous feedback loop



Quality analytics: Identify data quality issues related to formatting, logical value checks and data integrity with automated reviews across the CMS data universes from the seven program areas using the business solution



Compliance and timeliness analytics: Review timeliness performance and compliance findings at the universe level and by operational area — state-specific timeliness logic must be included for MMPs



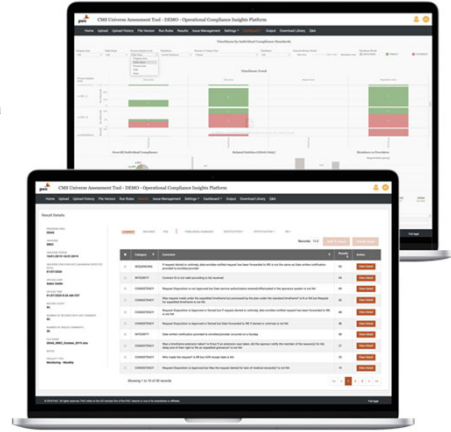
Operational compliance reporting: Provide on-demand and up-to-date operational, compliance and timeliness dashboards for management to dynamically identify actionable insights to process gaps and trends



Audit and issue tracking: Seamlessly identify and track the remediation of data quality and business process gaps



Up-to-date protocols and rules, team guidance: Business logic must be maintained based on CMS program audit protocol updates, HPMS memos, CMS audit interaction, or other regulatory interactions



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