



Building an Audit Ready Pharmacy Compliance Program

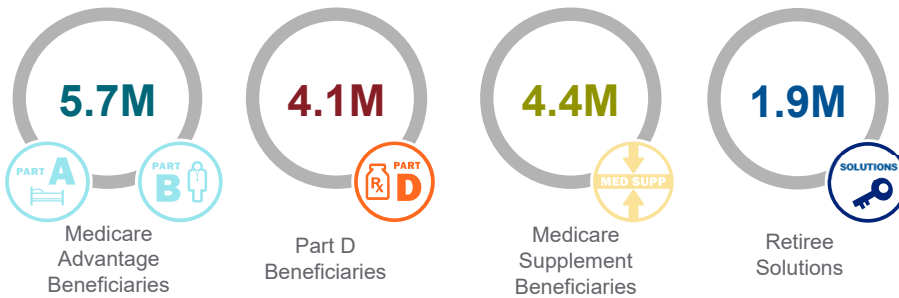
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UnitedHealthcare Medicare & Retirement



- Headquartered in Minnetonka, Minnesota, UnitedHealth Group is comprised of 325,000 people focused on a mission — helping people live healthier lives and making the health system work better for everyone — leading in the development of the next-generation health system in a socially conscious way, one person at a time. Our enterprise is organized into two complementary but distinct business platforms: Optum and UnitedHealthcare.
- UnitedHealthcare Medicare & Retirement serves **1 in 5** Medicare beneficiaries and is dedicated to serving the growing health and well-being of Medicare beneficiaries. Through a comprehensive and diversified array of products and services, we help over 12.5 million people manage their health.


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What does “audit ready” really mean?

- No surprises.
- Know your regulator, what they are looking at and how.
- Know your business and help them prepare.
- Know how you’ll perform and what your risks are.
- Even better...you’re working to mitigate any known risks.

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- 1 Should I have seen this coming?**

- 2 Assessing Risk**

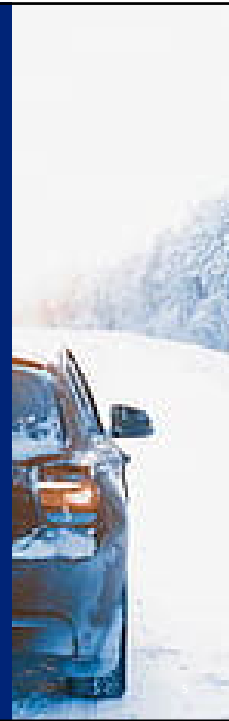
- 3 Developing your Compliance Work Plan and Monitoring Plan**

- 4 Building a Regulatory Audit Readiness Strategy**

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**Should I
have seen
this
coming?**



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**What could
go wrong?**

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Assessing Risk



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Assessing Risk

Where should I focus and what are all the signs telling me?

- Business Priorities
- Past Issues
- Auditing and Monitoring Results
- Organizational Changes
- New Systems or Technology
- Regulatory Changes
- Regulator Work Plans
- Enforcement Activity
- Conferences
- Regulatory Interactions and Communications
- Regulator Audit Reports
- News Articles and TV
- Industry Newsletters and Associations
- Member Complaints

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Creating a Flexible Compliance Work Plan and a Monitoring Plan

- Risk assessment results should drive the work plan and the monitoring plan.
- Determine which risks will be addressed and how (including monitoring).
- Communicate the top risks and work plan and ensure alignment with business priorities.
- Constantly reassess – be flexible vs. sticking to the plan.



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Partnering to Achieve Greater Outcomes

- How can business owners and Compliance partner to achieve greater outcomes?
- What is the role of Business vs. Compliance Monitoring vs. Audit?
- When should I use Compliance monitoring?
- Be sure to clarify purpose (what are we trying to achieve), roles, and responsibilities for monitoring, reporting, and corrective actions.
- Actionable reporting



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Building a Regulatory Audit Readiness Strategy

- How can we be “audit ready”?
- Communicate the risks of not taking action.
- How do I help the business understand what will be reviewed?
- Implement a way to practice pulling universes and reviewing samples.
- Identify risk areas and corrective actions needed.
- Identify opportunities to influence the audit protocols – comment opportunities.

What does “audit ready” really mean?



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Questions

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