



**MEALS ON WHEELS**

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# The ABCs of Compliance

## It doesn't have to be scary!



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# Introduction

- A changing and increasingly complex health care environment presents many challenges to health plans.
- Organizations entering this space must be fully knowledgeable about their roles and responsibilities.
- Also important to know are the compliance issues health plans face as you prepare to partner with a plan.

# Agenda

Nuts and bolts, including how health plans have onboarded small organizations

- Key requirements
- Discuss common challenges
- Dedicated time to share successes, document next steps





# Bipartisan Budget Act of 2018

## Did you know?

Allows Medicare Advantage (MA) plans, beginning CY2020, to offer non-primarily health related supplemental benefits to chronically ill enrollees.

- Also waives uniformity requirements (meaning benefits may vary based on specific conditions and needs)

Includes providing meals beyond a limited basis if benefit has reasonable expectation of improving or maintaining health and overall function as it relates to the enrollee's chronic condition or illness.

[Announcement of Calendar Year \(CY\) 2020 Medicare Advantage Capitation Rates and Medicare Advantage and Part D Payment Policies and Final Call Letter, April 1, 2019](#)

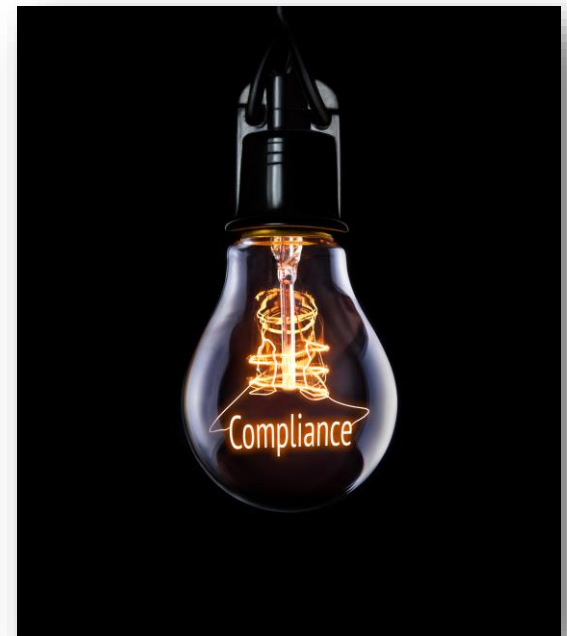
# Key Requirements

Privacy and security rules

Compliance program requirements vary depending on line of business!

- **Medicare Advantage (MA)**
- Medicaid: state-specific
- Marketplace/Exchange

Controls to address noncompliance and fraud, waste, and abuse



# Not ABC, but PDC!

Key controls include:

- **Prevention**, such as Compliance Officer, policies and procedures, education and training
- **Detection**, such as auditing and monitoring
- **Correction**, actions taken to address identified problems



Hot Topics: Prevention, Detection, Correction. February 9, 2016, D. Dodge.  
[SCCE Compliance & Ethics Blog](#)

# Aspects of MA Compliance Requirements







# Delegation of Services

First, the health plan applies to offer a benefit or service for the coming plan year; requires approval and contract.

When the health plan delegates the delivery of the benefit or service to another organization, certain requirements are passed down via contract or delegation agreement.

You must understand your scope, determine what safeguards and protections are in place already, then fill in any gaps.

# Healthcare Compliance

Health plan is your #1 partner

Multiple aspects that create compliance program success:



# What are some ABCs of compliance?

## One compliance program's story





# How health plans may onboard

Contractual and delegation requirements should be clearly communicated to organizations large and small.

- Compliance program policies
- Standards or code of conduct
- Pre-delegation audit
- New vendor questionnaire
- Attestation requests
- Regularly scheduled meetings

# Scenarios and Common Challenges

Understand compliance issues health plans face



# Discussion Scenarios

Common challenge 1:

You receive a questionnaire asking information you are not aware of, or an attestation request you are not prepared to sign.

Yes? No? Not applicable?





# Common Challenge 1

## How do we respond?

Does the company have a process to detect and investigate potential ethical or legal issues?

Does the company have a designated Compliance Officer or other official who handles these types of complaints and oversees compliance with corporate policies and State/Federal regulations?

Is there a policy to protect whistleblowers?

Is customer data and information safeguarded?



# Common Challenge 1

## How do we respond?

Does the company have a business resumption plan?

Are there emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans in place?

Do workers younger than 18 perform work which jeopardizes their health or safety?



# Discussion Scenarios

Common challenge 2:

Your organization has very few employees. Who is going to:

- Manage the compliance program
- Sign attestations
- Monitor activities and report to the health plan



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# Group Discussion and Exchange

Challenges ▷▷▷ Best practices



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1. Discuss together: share how you are already fulfilling compliance requirements
2. What contractual requirements are a challenge?
3. Begin roadmap for implementing outstanding requirements
4. Takeaway list

# Why compliance is not scary

Your health plan needs your organization to succeed.

Meals are a **benefit offering**.

”Gotcha” and punitive culture helps no one.

Their compliance program is typically long-standing – leverage it!



# Many resources available at low/no cost

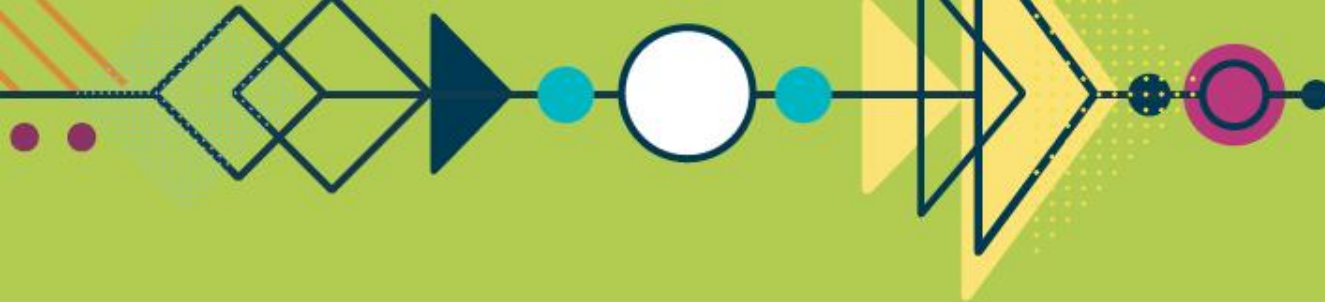
- *Health plan Compliance Officer*
- *CMS conferences/events*
- *Health Care Compliance Association*
- *Outside assistance*
- *Next step: implement your roadmap!*



# You are the experts in your service!

Let them support you with your compliance program.





**Thank you for your commitment to  
your clients!**

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