



CMS Provides Further Clarification on Program Audit Universe Fields

BluePeak Finds Minor Changes from Revised Draft to Final 2017 Program Audit Protocols

If your plan was not audited in 2016, now is the time for a mock audit. BluePeak is currently assisting clients by conducting mock audits, using the recently released Centers for Medicare & Medicaid (CMS) final 2017 Program Audit Protocols, and providing support during actual CMS audits, and we can help you and your team, too.

CMS provided additional clarification on operational program audit universe fields, as well as changes from 2016 to 2017 Compliance Program Effectiveness (CPE) program audit protocols, during the recent [2017 Medicare Advantage and Prescription Drug Plan Audit & Enforcement Conference](#).

BluePeak summarized changes from [2016 to 2017 draft program audit protocols](#) and changes from the [draft to revised draft 2017 protocols](#) in previous newsletters. Changes from the revised draft to final 2017 program audit protocols were minimal and are listed below.

All Program Areas: Sections and Changes

- Sponsor Disclosed Issues: Pre-Audit Issue Summary (Attachment VIII) replaced with Pre-Audit Issue Summary template
- Submit Universes to CMS and Appendix A: Comma Separated Values (.csv) removed as an acceptable universe format, except for Compliance Program Effectiveness (CPE). Excel and text are the only acceptable universe formats.
- Audit Process and Data Request: Paperwork Reduction Act (PRA) disclosure statement added to last page.

FA: Universe Field Clarifications

- For Rejected Claims Formulary Administration (RFCA), Rejected Claims Transition-New Contract Year (RCT-N) and Rejected Claims Transition -Previous Contract Year (RCT-P):
 - NDC: Additional language on multi-ingredient compounds and special characters
 - Reject Reason Code and Pharmacy Messaging: Reworded for clarity
- Prescription Drug Event (PDE): Additional language on multi-ingredient compounds and special characters
- New member: Clarified Enrollment Effective Date and Effective Disenrollment Date is at PBP level.

CDAG: Call Logs Review Period

- Audit Review Period and Table 16: The audit review period for Part D Call Logs (Table 16) varies depending on the plan's size.

ODAG Exclusions

- Exclusions were added back to all universe record layouts, except for Standard and Expedited Grievances and Part C Call Logs universes.

Contact BluePeak at (469) 319-1228 or info@bluepeak.com for a free consultation.