From: Rebekah Steggert **On Behalf Of** Medicare Compliance Officer
Sent: Thursday, March 19, 2015 10:56 AM
To: FDRCommunications
Cc: Thelma Fullmer; Beth Socoski; Angela Jackson
Subject: 2015 CMS Audit Process and Protocols - Gateway Health FDR Communications - 2015 Volume 3 (March)

Hello,

The Centers for Medicare and Medicaid Services (CMS) conducts program audits annually to evaluate sponsoring organizations' compliance with core Medicare Part C and Part D program requirements. CMS pays particular attention to those requirements that safeguard beneficiaries' access to medically necessary services and prescription drugs. This includes clinical decision making, timely notification of decisions, proper classification of beneficiary requests, appropriate administration or Gateway's formulary, timely effectuation of approved drugs and services, and so much more.

With the recent release of the CMS 2015 Program Audit Process and Protocol Updates, I want to share some pertinent information with you. As First Tier, Downstream, and Related Entities (FDRs) that have been delegated to perform core functions for Gateway Health^{SM} Medicare products, it is important that you review and understand this information. If Gateway Health is selected for an audit, we will need to work with many of you to obtain the required information in order to satisfy CMS requirements and facilitate a successful audit.

This year, CMS will audit the following core program areas:

- Part C and Part D Compliance Program Effectiveness (CPE)
- Part C Organization Determinations, Appeals, and Grievances (ODAG)
- Part D Coverage Determinations, Appeals, and Grievances (CDAG)
- Part D Formulary and Benefit Administration (FA)
- Special Needs Plans – Model of Care (SNP-MOC)

Additionally, CMS has added two pilot program areas, which include:

- Medication Therapy Management
- Provider Network Adequacy

I have attached CMS's memo regarding changes to the 2015 audit process for your review. Over the next few months, these communications will focus on the CMS Audit Process, as well as common findings that CMS observed during the 2014 Program Audit Cycle.

More information about the CMS 2015 Program Audit Protocols and Process Updates is available on CMS's website at:

http://www.cms.gov/Medicare/Compliance-and-Audits/Part-C-and-Part-D-Compliance-and-Audits/ProgramAudits.html

If you have questions, concerns, or would like further information before the Gateway's April communication is distributed, please contact your Gateway business owner, or submit your questions to MedicareComplianceOfficer@GatewayHealthPlan.com.

You received this email from MedicareComplianceOfficer@GatewayHealthPlan.com because CMS requires ongoing communication between Gateway's Medicare Compliance Officer and FDRs to raise awareness of potential compliance issues and risks to organizations. This is the **third communication** sent this year. Please share this communication with your staff and downstream entities.

Gateway Health is committed to achieving compliance with CMS rules and regulations. Thank you for supporting Gateway Health's Medicare Compliance Initiatives!

Angela Jackson

Medicare Compliance Officer

Gateway Health^{SM}

Four Gateway Center

444 Liberty Avenue, Suite 2100

Pittsburgh, PA 15222-1222

Email: ajackson1@gatewayhealthplan.com

Rebekah Steggert

Senior Compliance Analyst | Medicare Compliance

Gateway Health^{SM}

Four Gateway Center

444 Liberty Avenue, Suite 2100

Pittsburgh, PA 15222-1222

Phone/Fax: (412) 255-7116

Email: rsteggert@gatewayhealthplan.com