

Assessment Solutions Provide Compliance Relief

Overview

CIS was retained by a top ten pharmaceutical manufacturer to proactively assess the compliance and efficiency of its Medicaid Processing Department. Because maintaining adequate documentation of statutory pricing submissions, contracts and quarterly claims processing is vital to ensuring compliance with statutes, regulations and guidance; the department undertook several internal initiatives, including:

- Improving capabilities and effectiveness with respect to dispute resolutions,
- Improving internal Medicaid processes to make them more efficient,
- Updating policies and procedures related to these processes,
- Ensuring proper retention of documentation, and
- Ensuring efficient and effective responses to audit requests.

The department looked to CIS to ensure that their recent initiatives had been successful and that goals and objectives were being met in an effective, efficient and compliant manner. The department also requested an evaluation of its audit readiness, to ensure it could adequately and appropriately respond to requests from external parties and/or government auditors. Finally, the department asked CIS to provide a set of industry best practices, based on the experience and subject matter expertise of CIS' consultants, which would allow the client to take steps to improve departmental process efficiencies and overall audit readiness.

Scope

CIS concentrated its assessment on determining the department's audit readiness from a process and documentation compliance perspective, paying specific attention to the audit trail.



Proven Expertise

CIS is a consulting firm specializing in compliance strategies for pharmaceutical companies. Our experts can quickly identify your exposure to compliance risks, help you develop a strategic plan and ensure its implementation and ongoing adherence to legal and regulatory requirements.

CIS has a deep understanding of the following Government Programs:

- OIG Compliance
- Medicare Part B & D
- Medicaid Drug Rebate Program
- VA & PHS
- Federal & State Contracting



In performing this assessment, CIS evaluated the department processes, statutory pricing submissions and documentation of quarterly claims packets to identify any current or potential compliance risks.

Methodology

In order to effectively evaluate the compliance and audit readiness of the Medicaid Processing Department, CIS performed the following review functions:

1. CIS reviewed corporate guidance documents and standard operating procedures (SOPs) that govern the Medicaid processes.
2. CIS interviewed Medicaid Processing personnel to determine their roles in the process, and documented their understanding of these roles in the form of Interview Narratives.
3. CIS reviewed processes, as well as pricing, contract, and claims records retained by the department.
4. CIS reviewed dispute creation and resolution processes.
5. CIS assessed the overall Audit Readiness of the Medicaid Processing Department, with regards to each of the functions listed above.
6. CIS documented suggested opportunities for improvement within project work papers, based on risk prioritization, to optimize department compliance, performance and efficiency.

Deliverables

CIS provided the Medicaid Processing Department with the following deliverables to describe the results of the assessment, and suggest ways to make improvements in departmental process efficiencies and overall audit readiness.

1. Assessment Report
 - a. Findings
 - b. Risk Prioritization
 - c. Audit Readiness Scorecard
 - d. Recommendations
2. Assessment Test Matrices (work papers)
3. Assessment Presentation

Benefits

The Medicaid Processing Department benefited from the assessment performed by CIS in several ways:

1. First, the department met its internal objective of performing a comprehensive internal assessment to fulfill an annual monitoring requirement and evaluate its compliance with government and internal requirements, and its performance to industry standards.
2. Second, the department was able to identify the key risks associated with their processes, and develop effective controls to mitigate these risks, using the Risk Prioritization Grid provided by CIS.
3. Third, the department was able to increase the likelihood of a successful future audit outcome, using the Audit Scorecard provided by CIS. Specifically, CIS identified areas where processes or procedures could be enhanced to improve audit readiness.
4. Fourth, the department was able to identify where updates to their policies and procedures were needed, to make them more accurately reflect their day to day tasks.
5. Fifth, CIS was able to provide ways to better analyze and improve the dispute creation and resolution process.

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