CMS Medicare Managed Care Auditing Report

Auditing Review Results (Initial Report)-Public Website Version

Date Report Generated: 9/30/2008

MRT Number: M0007, Contract Number: All, Category: All, Element: All, Finding:NOT MET, Reviewer:All

Findings: NOT MET

Review ID: 12759

Region: 09 San Francisco

MRT Number / Name: M0007 MRT Kaiser Permanente

Contract Number / Name: H6050 KAISER FOUNDATION HP, INC.

Auditing Guide Version: MA Audit Review Guide, Version 5

Auditing Element: ZZ02

Review Type: Ad-Hoc Compliance Event

Review Status: Confirmed

MCO Response Received Date:07/21/2008

Element Accepted Date: 09/08/2008

Element Release Date: 09/08/2008

CAP Released Date:09/08/2008

Visit Start Date: 06/18/2008

Exit Conference Date: 06/18/2008

Date Report Issued: 06/18/2008

Date Report Due: 08/02/2008

CAP Accepted Date:09/08/2008

Audit Closed Date: 09/08/2008

Element Projected Completion Date:09/08/2008

MCO Response Due Date: 08/02/2008

Requirement:

Ad-Hoc Compliance Event

Deficiencies:

Kaiser self-disclosed that the Medicare Advantage Organization (MAO) has been treating STRS/PERS entity as an Employer Group Plan when in actuality, the entity not legally an Employer Group.

Corrective Action Required:

The CAP should include the following information: 1. A written background summary the issue. 2. A list of which contracts are affected. 3. A description of the actions Kaiser will take to correct this deficiency. 4. A timetable for when each activity will be fully implemented as well as the Kaiser staff member responsible for implementation. 5. A robust and meaningful outreach effort plan to educate individuals about this change, ensuring that the information clear states that the individuals are not limited in any way to selecting only another Kaiser product. Outreach efforts should encourage each individual to review all options offered by employers/former employers in the decision making process. 6. Selection of one plan (one PBP serving each applicable area) into which all individuals from the STRS/PERS group will default if they have not selected another enrollment option. In other words, Kaiser may not distribute these individuals across various products within service areas. The ¿default¿ into an individual KPSA plan follows the requirements provided in section 50.7 (option 1) of the MA enrollment guidance with 2 key adjustments that must also be included in the CAP: a. Plans to provide information and a simple mechanism to decline enrollment, to provided no later than October 31, 2008, to ensure individuals are aware before the start of the AEP, and b. Notice to the individuals of an available SEP beginning on November 1, 2008 and ending on January 31, 2009, which is not limited to selecting only Kaiser products. 7. A description of the measures Kaiser will employ to ensure continued compliance after the corrective actions are in place. 8. Notification and/or script to the members, including their submission for Regional Office review and approval.

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Findings: NOT MET

Review ID: 12759

Region: 09 San Francisco

MRT Number / Name: M0007 MRT Kaiser Permanente

Contract Number / Name: H0524 KAISER FOUNDATION HP, INC.

Auditing Guide Version: MA Audit Review Guide, Version 5

Auditing Element: ZZ02

Review Type: Ad-Hoc Compliance Event

Review Status: Confirmed

MCO Response Received Date:07/21/2008

Element Accepted Date: 09/08/2008

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MCO Response Due Date: 08/02/2008

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Findings: NOT MET

Review ID: 12759

Region: 09 San Francisco

MRT Number / Name: M0007 MRT Kaiser Permanente

Contract Number / Name: H6052 KAISER FOUNDATION HP, INC.

Auditing Guide Version: MA Audit Review Guide, Version 5

Auditing Element: ZZ02

Review Type: Ad-Hoc Compliance Event

Review Status: Confirmed

MCO Response Received Date:07/21/2008

Element Accepted Date: 09/08/2008

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