



Troy Medicare Policy and Procedure

Title: CMS Readiness Checklist			Policy Number: CMP_026		
Primary Department: Compliance		LOB: Medicare Advantage		Author: S Scott	
Effective Date: 4/1/2023	Original Date: 4/1/2023	Review Date(s): 1/18/2024		Archive Date:	
Interactive Related Department(s)					
☒ All Departments ☐ Compliance ☐ Medical Management ☐ Provider Operations ☐ Sales and Marketing		☐ Appeals and Grievances ☐ Pharmacy ☐ Member Services ☐ Quality Management ☐ Utilization Management		☐ Care Management ☐ Enrollment ☐ Plan Administration ☐ Claims ☐ Other	

POLICY PURPOSE

On an annual basis, in late fall, the Centers for Medicare and Medicaid Services (CMS) issues a reminder through a Health Plan Management System (HPMS) memorandum to all organizations of the critical Medicare Part C and Part D requirements for the Annual Election Period (AEP) and coverage that will begin in the upcoming calendar year. Along with this reminder is a "Readiness Checklist" that summarizes key operational requirements that are established in statutes, regulations, manual chapters, HPMS memos, applications, and other advisory materials.

As a contracted Medicare Advantage Organization (MAO) and Part D Plan Sponsor, Troy Medicare (Troy) must carefully review the checklist and take all necessary measures to ensure compliance with the key requirements set forth in the checklist. Furthermore, Troy Medicare must identify areas where it needs assistance or is not/will be in compliance and must report those issues directly to its CMS Account Manager.

Troy Medicare is committed to complying with federal and state rules and regulations.

SCOPE

This policy applies to all Troy departments.

REFERENCES

- 42 C.F.R. §§ 422 and 423
- CMS Medicare Managed Care Manual
- CMS Medicare Prescription Drug Manual
- HPMS Memorandums: "Readiness Checklist for Medicare Advantage Organizations, Prescription Drug Plans, and Cost Plans".

RESPONSIBLE PARTIES

- Chief Compliance Officer

DEFINITIONS

- HPMS - The Centers for Medicare & Medicaid Services' (CMS) Health Plan Management System (HPMS) is a web-enabled information system that serves a critical role in the ongoing operations of the Medicare Advantage (MA) and Part D programs.

POLICY

Troy Medicare shall review all requirements set forth in the CMS Readiness Checklist and shall identify all areas where it needs assistance or is not/will not be in compliance by January 1st of the following contract year. Troy Medicare shall identify such areas, develop internal action plans, and report them to the CMS Account Manager no later than December 20th of each calendar year. Troy Medicare's Compliance Department shall monitor all internal action plans and provide the CMS Account Manager with routine updates through completion of action plan as applicable.

PROCEDURE

1. Upon receipt of the CMS Readiness Checklist, the Compliance Department shall identify all applicable Senior Leadership and Management Staff responsible for each item on the checklist.
2. The Compliance Department shall disseminate the checklist and instructions to all applicable leadership and management staff via the "HPMS Memo Weekly Update" and as assigned within the internal HPMS Memo repository.
3. The Compliance Officer shall hold a meeting with all applicable leadership and management staff to review the checklist, instructions, and respond to any questions concerning Troy Medicare's internal process.
4. Each operational area shall provide to the Compliance Department, upon request, supporting documentation that demonstrates compliance with the requirement listed in the checklist. Such supporting documentation may include, but not be limited to:
 - a. Departmental Policy and Procedure
 - b. Operational Desktops
 - c. Screen-prints from systems
 - d. Meeting Minutes
 - e. Departmental Memorandums
 - f. Job Aids
5. The Compliance Department shall review all supporting documentation provided to determine whether Troy Medicare needs assistance or is not/will not be in compliance by January 1st and shall immediately schedule an urgent meeting with any applicable operational area to review the problem.
6. The Compliance Department shall work directly with the applicable operational area to develop an internal action plan that identifies all actions necessary to come into compliance with the requirements listed. Such internal action plans shall list each task, responsible party, and expected completion date.
7. The Compliance Department shall notify the Troy Medicare CMS Account Manager no later than December 20th of any requirements for which Troy Medicare has identified a problem and/or non-compliance.

8. The Compliance Department shall monitor all internal action plans and shall provide, as requested, the CMS Account Manager with routine updates on the status of such plans through completion.
9. Upon completion of all action plans, and the Compliance Department review determines that all supporting documentation demonstrates compliance with all requirements as listed within the CMS Readiness Checklist, the Compliance Department shall notify the CMS Account Manager.

ATTACHMENTS/RELATED POLICIES/STANDARD OPERATING PROCEDURES/FORMS

- None

APPROVALS



Chief Compliance Officer

02 / 08 / 2024

Date



Policy Committee

02 / 14 / 2024

Date

Revision History:

Date	Author	Revision Notes
1.1.2023	S Scott	Initial policy
1.18.2024	S Scott	Revised process to reflect operational documentation provided upon request, and updates to CMS upon request