



MCS Healthcare Holdings, LLC

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| Procedure No: CA-COMP-071 | | Page 1 of 2 |
| Department: Compliance | Effective Date: July 16, 2014 | |
| Unit: Auditing and Monitoring | Most Recent Revision Date: 10/21/2020 | |
| Procedure Title: Medicare Compliance Dashboard | Applies to: <input checked="" type="checkbox"/> MCS Advantage, Inc. <input type="checkbox"/> MCS Healthcare Holdings, LLC <input type="checkbox"/> MCS General Insurance Agency <input type="checkbox"/> MCS Life Insurance Company | |
| Approved by: Corporate Compliance Committee | | |

PURPOSE

To support the oversight activities pertaining to the Medicare Advantage processes.

PROCEDURES

A. Medicare Compliance Dashboard

1. The Medicare Compliance Dashboard (MCD) is one of the tools used by the Compliance Department to report, track and compare over time, MCS' compliance with key Medicare Parts C and D requirements.
2. The MCD includes key performance indicators (KPIs) of Medicare Parts C and D operations for the following processes:

Enrollment and Disenrollment, Late Enrollment Penalty (LEP), Customer Service Call Center, Part D Coverage Determinations, Appeals, and Grievances (CDAG), Part C Organization Determinations, Appeals, and Grievances (ODAG), Grievances (C and D) and Appeals, Complaint Tracking Module (CTM), Pharmacy and Special Needs Plan (SNP).
3. In a monthly basis, the Compliance Department creates a task thru Compliance 360 (C360) requesting each operational area to provide the MCD data for the previous month.
4. Each operational area is responsible for submitting along with the results an explanation for those KPIs that were not-reported, non-compliant or that were not applicable for the period.

B. Delegated Entities Compliance Dashboard

1. The Delegated Entities Compliance Dashboard is one of the tools used by the Compliance Department to track and compare over time the compliance with key Medicare Part C and D requirements for the following delegated entities: TNPR, EMPR, Net Claim, FHC and Envision. The metrics included in the dashboard are a key element that supports the oversight activities pertaining to the Medicare Advantage processes delegated to these entities.
2. In a monthly basis, the Compliance Department creates a task thru Compliance 360 (C360) requesting each Delegated Entity Business Owner to provide the Delegated Entities Compliance Dashboard for the previous month.

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3. Each business owner is responsible for submitting along with the results an explanation for those metrics that were not-reported, non-compliant or that were not applicable for the period.

C. Review, Analysis and Reporting of the Dashboards

The Compliance Department is responsible for:

1. Gathering all metrics by the 15th day for Medicare Compliance Dashboard and 20th day for First Tiers Compliance Dashboard, of each month or the next business day.
2. Analyzing the information to identify decrease trends in thresholds that could potentially lead to future noncompliance.
3. Randomly selecting metrics in order to test the accuracy of the reported data.
4. Requesting a Root Cause Analysis (RCA), Impact Analysis and when applicable a Corrective Actions Plan (CAP) to the operational area or First Tiers Entity for metrics in noncompliance in accordance with procedure CA-COMP-040 Internal Audit and Monitoring.
5. Include the appropriate notes in the dashboard for known issues (compliance issues identified/self-disclosed for the same period reported) that are not reflected in the dashboard but may have an impact in the compliance percentage.
6. The MCD and the First Tiers Entities Compliance Dashboard are updated and presented to the Medicare Compliance Officer (MCO) and shared with all impacted the operational areas/business owners and First Tiers Entities on a monthly basis.
7. On a quarterly basis, results are presented to the Corporate Compliance Committee (CCC) and/or impacted Senior Management in order to communicate -the identified non-compliance issues along with a summary of steps taken/ or that will take place to address the issue.
8. The Compliance Department maintains in Teammate, the results of the dashboards including evidence of the notifications to the MCO, CCC, Senior Management and operational area/business owners impacted.
9. Modifications in the dashboards may occur throughout the year as risks change and evolve with changes in the law, regulations, CMS requirements and operational matters. Prior to implementing changes and/or modifications to the metrics gathered, discussion and approval of the MCO or delegate, if necessary.

DEFINITIONS

1. Compliance 360 (C360): Is an enterprise-wide platform to provide centralized management of regulations, as well as the ability to manage all corporate policies, surveys, remediation projects, internal audits and assessments to mitigate risks and improve efficiencies.
2. KPI not reported (N/R): If the metric cannot be reported because it has not configured yet.
3. KPI not applicable (N/A): If there is not information to be reported.
4. TeamMate: Audit Management Software System that integrates paperless strategies for managing the

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REFERENCES

ATTACHMENT(S)

N/A

RELATED MCS POLICIES

MCS-Policy-006 Effective System for Routine Monitoring and Auditing
MCS-Policy-007 Prompt Response to Compliance Issues

PROCEDURE REVISIONS:

| DATE | CHANGE(S) | REASONS |
|-------------|--|---|
| 8/25/2015 | Update to the key performance indicators that are included in the Dashboard. Inclusion of language regarding CMS timeliness thresholds. Modification of the frequency of CAP requests when any non-compliance issue is identified through the MCD. | Annual Review of P&Ps. |
| 8/9/2016 | Revised policy and made minor changes. | Annual revision to comply with CA-COMP-001. |
| 12/20/2017 | Update definitions and timeframes. | Annual revision to comply with CA-COMP-001. |
| 1/30/2019 | Language clean-up and clarification of process. | Annual revision of procedure. |
| 12/17/2019 | To include procedures performed for the new Delegated Entities Compliance Dashboard | Annual Review. |
| 7/10/2020 | Reflect new organizational changes. | Ad hoc review. |
| 10/21/2020 | To include timeframe for submission for First Tiers Entities. | Annual Review |

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