



# INVALID UNIVERSE SUBMISSIONS CAUSING A RIPPLE EFFECT?

## BLUEPEAK ADVISORS CAN HELP.

**An incomplete and incorrect universe can add 1 point toward your CMS Program Audit score and take a whole lot more from your bottom line.**

An Invalid Data Submission (IDS) condition is cited when a plan fails to produce a complete and accurate universe within 3 attempts. An IDS can significantly increase the overall CMP amount assessed by CMS for conditions found during a CMS Program Audit. The base amount of \$25,000 per violation/contract is adjusted annually. In 2017, the CMP for an IDS per violation/contract was \$36,794.

An IDS can have a ripple effect on a plan's audit score. If CMS auditors are unable to test audit elements from samples because of IDS, they will cite a condition for each element that cannot be tested, grouped by the type of case.

CMS may cite a Corrective Action Required (CAR), a condition worth 1 point, or an Immediate Corrective Action Required (ICAR), a condition worth 2 points, for each element that cannot be tested due to an IDS, thereby adding more points into the audit scoring methodology. BluePeak has observed the ripple effect of an IDS in many of the mock audits performed for clients, as well as when assisting clients through actual CMS Program Audits.



The IDS follows the plan into audit validation, where the plan must produce the universes that the auditors were unable to test during the original audit, to demonstrate their compliance with CMS requirements. BluePeak has validated whether an IDS condition was corrected in the many mock and CMS validation audits conducted.

BluePeak understands the impact Invalid Data Submissions can have on a plan's CMS Program Audit score, subsequent validation audit and past performance. A CMS Program Audit score is one of 11 performance categories used by CMS to evaluate past performance and ultimately determine whether a plan can file new applications or service area expansions. BluePeak knows the constraints on time and resources which prevent plans from being audit ready and result in universe fire drills during a CMS Program Audit. Whether you've found yourself in this scenario or want to never find yourself in this scenario, **BluePeak's Universe Monitoring Service** was developed just for you.

**GET IN TOUCH** →

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# BLUEPEAK'S UNIVERSE MONITORING SERVICE IDENTIFIES UNDERLYING OPERATIONAL ISSUES



BluePeak developed **UMS** as an audit-readiness resource for plans. Every plan should be monitoring their universe data on a regular basis, but the reality is that universe monitoring competes with the organization's other priorities and resources and gets pushed to the back burner. Until a CMS Program Audit, and that's not the time to start a fire drill. BluePeak is composed of industry experts who've been there, done that. We built **UMS** just for you.

BluePeak consultants can review your universe data for technical issues, such as blank cells, incorrect formats and inaccurately populated fields. Our seasoned subject matter experts can also analyze your universe data and identify potential operational issues, such as untimeliness, that would be red flags to CMS auditors. In addition to calculating timeliness, we use a proprietary analytics system, unique to the universes for each program audit area, to identify potential underlying issues. Issues that, left undetected, have a way of surfacing during CMS Program Audits.

## UMS BREAKOUT | Timeliness Monitoring Project (TMP) Mock Reviews and Support

In 2017, CMS began conducting an annual industry-wide monitoring project to evaluate the timeliness of processing of Medicare Advantage (Part C) organization determinations and reconsiderations and Medicare Prescription Drug (Part D) coverage determinations and redeterminations. Plans are required to submit applicable universes with data from up to 3 months from the previous year, dependent upon their total enrollment.

The data is usually collected in three waves, and plans can expect to receive notices and data requests starting in January. Exempt from this requirement are plans who underwent a Program Audit without any Invalid Data Submission (IDS) conditions and had at least one month of data for each of the universes from the previous year.

CMS has levied CMPs on plans for deficiencies identified during TMP reviews. BluePeak can help plans monitor and identify issues in their TMP universes BEFORE CMS does and avoid costly CMPs.

Don't wait until you receive your timeliness monitoring notice. BluePeak can help you prepare now. BluePeak is experienced in timeliness monitoring and CMS program audits. BluePeak can review universes, identify risk and outliers, and coach your team and your first-tier, downstream and related entities (FDRs) on how to present the data. BluePeak also provides support during actual CMS timeliness monitoring reviews.

**Call us today for a free consultation.**

SO, THE NEXT TIME YOU THINK OF UNIVERSE PULLS AND REVIEWS, INSTEAD OF REACHING FOR THE TUMS, REACH OUT TO UMS.



Contact BluePeak today for a **FREE** consultation!  
[www.bluepeak.com](http://www.bluepeak.com)