

# VALIDATION AUDIT?

WHO YOU GONNA CALL?



From the time CMS approves your corrective action plans (CAPs), you and your team have 150 days to correct deficiencies found during the audit, hire an Independent Auditor (IA) to conduct the validation audit, and attest to CMS that all deficiencies have been corrected and will not reoccur.

BluePeak Advisors can assist you in two ways, by 1) providing the Independent Validation Audit (IVA) for CMS and 2) providing mock validation audits before the CMS validation audit to ensure your universes are clean, and all conditions found during the CMS program audit have been remediated.

BluePeak began conducting validation audits long before CMS formalized the process in 2015. From 2010-2015, BluePeak performed 30 validation audits. Since 2016, BluePeak has completed 11 or more validation audits per year, utilizing CMS' IVA process. BluePeak Advisors continues to conduct CMS validation audits and mock validation audits for our current clients, in accordance with CMS guidance.

Our experienced teams have worked with plans and CMS to submit validation audit work plans that are accepted by CMS.



## 150 DAYS FROM CAPS ACCEPTANCE TO ATTESTATION

- 1 Hiring an IA:**

CMS will not provide recommendations on IA firms. The hired IA must be independent, with no conflicts of interest, and must have subject matter expertise in the areas of Medicare Part C and Part D that will be reviewed for validation.
- 2 Developing a Validation Work Plan and Timeline:**

The IA will work with the Sponsor to develop a validation work plan, including the scope and timeline of the validation, to be submitted to CMS.
- 3 Conducting the Validation:**

The IA must conduct the validation according to the CMS-approved work plan.
- 4 Reporting the Results of the Validation Audit:**

The IA will submit the validation report to the Sponsor. If the Sponsor decides the program audit conditions have been corrected and are not likely to recur, based on the IA report, the Sponsor submits the IA's report to CMS.
- 5 CMS Review of the Validation Report and Other Information:**

Upon review of the IA's validation report and additional information submitted by the Sponsor, CMS will decide whether to issue an audit close-out notice or advise the Sponsor of next steps.

Source: Audit Validation and Close Out for CMS Program Audits, Updated May 8, 2017

NEED AN IA?

Visit our website at [www.bluepeak.com](http://www.bluepeak.com) or call us at (469) 319-1228 for a free consultation  
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