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Owner Porsche Glover:
 Senior Compliance Analyst
 Area Compliance
 Applicability VillageCare Corporate Services

Hpms Repository And Action Management Policy 8.8.

PURPOSE

The purpose of this policy is to provide process overview for users who have actionable and reporting requirements for Health Plan Management System (HPMS) memos based on detailed information contained within the HPMS Memo and summarization completed by AVP of Medicare Regulatory Compliance.

SCOPE

This policy applies to Regulatory Compliance and all users that have been identified as Business/Task Owners per the memo specification(s).

POLICY

VillageCare of New York uses an electronic repository (i.e., CodySoft®) to create, revise, approve, store and manage its policies, procedures, plans and guidelines. This policy outlines the functionality and operational processes of the CodySoft® HPMS Memo Module, hereinafter referred to as CodySoft by Regulatory and internal Business Owners for informational and activity completion.

DEFINITIONS

Business Owner(s): individual(s) serving as the point of contact or liaison for a specific internal area of operation and/or external first tier, downstream or related entity. May be referred to as BO.

HPMS Memo: 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. May be referred to as memo.

Ingestion: the process of absorbing information; the act or process of taking in something for or as if for digestion.

Liaison: a person who establishes and maintains communication for mutual understanding and cooperation.

PROCEDURE

Ingestion is the process of uploading all newly released HPMS memos. During this process, the memo title, brief memo description and attachments are loaded for review and task assignment (when required). The Regulatory team uploads & deciphers plan specific HPMS memos to the plan database and publishes these additions to the plan's library. When action is required, authorized users can assign responsible parties with tasks, establish due dates, update and track required responses. Business Owner(s) can appoint a representative from the specified departmental area to address and complete any/all action tasks.

Memo Dissemination

1. AVP of Medicare Regulatory Compliance department disseminates, via email, a high-level overview of the HPMS memo; hereinafter will be referred to as summary.
 - a. The summary is sent to all internal departmental representatives/points of contact/business owners (BO).
2. Each summary contains details of the HPMS memo and all actions that are required by the identified business area with which the memo is applicable. The email will contain the following items:
 - a. the original PDF of the memo details released by CMS attached
 - b. Identification if the item is actionable or informational
 - c. Urgency
 - d. Received Date (by health plan)
 - e. Department(s) affected
 - f. Purpose of the Notification,
 - g. Action Required
 - h. If action is required, date required to be implemented

Monitoring of regulatory memorandum/notification process

1. HPMS memos that are actionable are assigned to each applicable BO and are monitored for task completion within the CodySoft platform.
2. HPMS memos that do not require action are classified as informational. For informational memos, the Regulatory team will disposition the memo as such and close for repository storing and review by the plan and its officers.

3. On a weekly basis, the Regulatory Compliance department will review CodySoft and follow up with the appropriate departments concerning the status of items that have surpassed identified deadlines [for completion].
4. If FDRs or subcontractors are impacted by the regulatory changes, the Regulatory Compliance department works with the departments responsible for oversight of the FDRs/subcontractors to ensure that the message is communicated, and outstanding issues are resolved timely. FDRs attest to and are expected to follow all HPMS memos and state and federal regulatory guidance.

Attestation and submission process

1. Once the work plan and a process improvement/response is implemented, BO submits task for approval/rejection to Regulatory Compliance with the following completed task items:
 - a. Action Plan
 - b. Short Description
 - c. Monitoring Plan
 - d. Quality Assurance
 - e. Supporting documentation demonstrating completion of actions/tasks (if applicable)
2. The Regulatory Compliance department provides an HPMS Memo acquisition report bi-weekly during the Regulatory Compliance Operations Committee.

Approval Signatures

| Step Description | Approver | Date |
|-------------------------------------|---|-----------|
| Final Approval | Emma Devito: President & CEO | 8/10/2022 |
| Chief Compliance Officer | Dara Quinn: Chief Compliance Officer | 8/10/2022 |
| AVP, Medicare Regulatory Compliance | Sabrina Wright: AVP of Medicare Regulatory Compliance | 8/10/2022 |
| Policy Owner | Porsche Glover: Senior Compliance Analyst | 8/10/2022 |