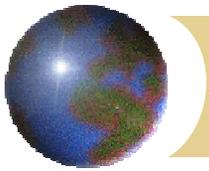
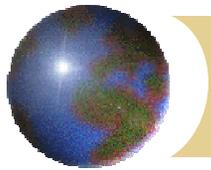


Future Contracting Expectations



Presentation Overview

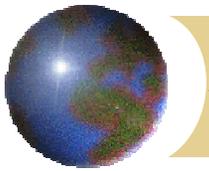
- ⊕ *Compliance Issues – Bill Heffron*
- ⊕ *Federal Competitive Procurements – Rodney Benson*
- ⊕ *Future MAC Competitions – Kathy Markman*
- ⊕ *CAS Overview – Larry Caton*
- ⊕ *CAS Implementation/Lessons Learned – Ned Boston*



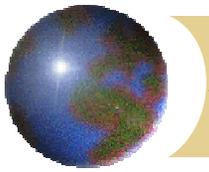
***COMPLIANCE PROGRAM
GUIDANCE
FOR
MEDICARE
FEE-FOR-SERVICE
CONTRACTORS***

Bill Heffron

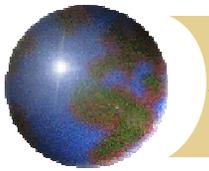
Acquisition Acquisition and Grants Group
Office of Operations Management



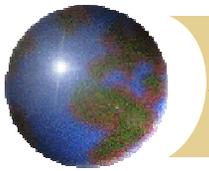
- ❖ Draft Compliance Program Guidance for Fee-For-Service Medicare Contractors to be issued
- ❖ 30 Day Comment Period



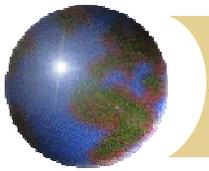
- ➊ CMS will review and consider all comments that are received
- ➋ Contractors should feel free to contact the Contractor Compliance Officer (CCO) if they have any questions regarding the draft guidance
- ➌ After considering contractor comments, a final version of the Guidance will be prepared



- Guidance based on the 7 elements identified by the U.S. Sentencing Commission
- Considered the findings from our on-site reviews
- Considered the wrongdoing that resulted in 16 civil settlements with the Department of Justice



- Guidance is fairly general
- Contractors need to tailor compliance plan to their own particular business situation
- Effective compliance programs require commitment from senior management



- ➊ CMS not requiring contractors to implement any of the provisions contained in the Guidance
- ➋ CMS is not specifically providing funding for contractors to implement any recommendations or provisions contained in the Guidance
- ➌ Given today's business environment, CMS believes it makes good business sense for contractors to have the best compliance program possible in order to protect the company and senior management from any potential civil or criminal liability