



**Focused Audit of Medicare FDR – Eldercare Insurance Services
Corrective Action Plan (CAP)**

Audit Date: June 22, 2016

Your organization must complete a root cause analysis to determine why your findings occurred. Using your analysis, your organization must develop a written Corrective Action Plan (CAP) which details the actions you will take to correct your findings and prevent future reoccurrences. For example, training/retraining of staff on compliance requirements should be considered as one of your corrective actions to be taken for each of your deficiencies. In addition, your organization should understand the consequences of such findings, including, for example, potential contract termination for failure to implement a corrective action plan to Aetna’s satisfaction.

REQUIREMENT AND FINDING	ROOT CAUSE ANALYSIS RESULTS	CORRECTIVE ACTION PLAN	DATE DUE	DATE COMPLETED	COMMENTS																																							
<p>First Tier provided COC and/or Compliance Policies to employees annually and when updates are made. (§ 50.1.3)</p> <p>Eldercare has self-reported that they had not documented annual distribution of COC/ Compliance Policies prior to an audit performed by their up-line in February 2016 and were in the process of correcting the identified deficiency during this audit. Evidence to support annual distribution is not available.</p>		<p>EIS adopted and implemented policies and procedures to remediate this deficiency in May 2016.</p> <p>EIS will provide to Aetna evidence to show distribution of the COC/Compliance policies to the following employees to validate the effectiveness of the policy by 9/22/16.</p> <table border="1" data-bbox="947 699 1463 1166"> <thead> <tr> <th colspan="3" data-bbox="947 699 1463 753">AGENCY NAME: Eldercare Insurance Services, Inc. Year: 2016</th> </tr> <tr> <th colspan="3" data-bbox="947 753 1463 784">FDR EMPLOYEE INFORMATION</th> </tr> <tr> <th data-bbox="947 784 1125 834">EMPLOYEE FIRST NAME</th> <th data-bbox="1125 784 1304 834">EMPLOYEE LAST NAME</th> <th data-bbox="1304 784 1463 834">HIRE DATE</th> </tr> </thead> <tbody> <tr> <td data-bbox="947 834 1125 865">Alyssa</td> <td data-bbox="1125 834 1304 865">Beinborn</td> <td data-bbox="1304 834 1463 865">06/25/12</td> </tr> <tr> <td data-bbox="947 865 1125 896">Ronald</td> <td data-bbox="1125 865 1304 896">Brooks</td> <td data-bbox="1304 865 1463 896">08/15/98</td> </tr> <tr> <td data-bbox="947 896 1125 927">Candi</td> <td data-bbox="1125 896 1304 927">Golden</td> <td data-bbox="1304 896 1463 927">08/22/11</td> </tr> <tr> <td data-bbox="947 927 1125 958">Julie</td> <td data-bbox="1125 927 1304 958">Henson</td> <td data-bbox="1304 927 1463 958">06/30/14</td> </tr> <tr> <td data-bbox="947 958 1125 989">Mitchell</td> <td data-bbox="1125 958 1304 989">Herman</td> <td data-bbox="1304 958 1463 989">08/01/05</td> </tr> <tr> <td data-bbox="947 989 1125 1019">Robin</td> <td data-bbox="1125 989 1304 1019">Montgomery</td> <td data-bbox="1304 989 1463 1019">03/04/14</td> </tr> <tr> <td data-bbox="947 1019 1125 1050">Jeremie</td> <td data-bbox="1125 1019 1304 1050">Pielemeier</td> <td data-bbox="1304 1019 1463 1050">08/06/01</td> </tr> <tr> <td data-bbox="947 1050 1125 1081">Susan</td> <td data-bbox="1125 1050 1304 1081">Robinson</td> <td data-bbox="1304 1050 1463 1081">02/20/14</td> </tr> <tr> <td data-bbox="947 1081 1125 1112">Destiny</td> <td data-bbox="1125 1081 1304 1112">Rodgers</td> <td data-bbox="1304 1081 1463 1112">08/05/13</td> </tr> <tr> <td data-bbox="947 1112 1125 1143">Leslie</td> <td data-bbox="1125 1112 1304 1143">Stapp</td> <td data-bbox="1304 1112 1463 1143">06/19/08</td> </tr> </tbody> </table>	AGENCY NAME: Eldercare Insurance Services, Inc. Year: 2016			FDR EMPLOYEE INFORMATION			EMPLOYEE FIRST NAME	EMPLOYEE LAST NAME	HIRE DATE	Alyssa	Beinborn	06/25/12	Ronald	Brooks	08/15/98	Candi	Golden	08/22/11	Julie	Henson	06/30/14	Mitchell	Herman	08/01/05	Robin	Montgomery	03/04/14	Jeremie	Pielemeier	08/06/01	Susan	Robinson	02/20/14	Destiny	Rodgers	08/05/13	Leslie	Stapp	06/19/08	9/22/16		
AGENCY NAME: Eldercare Insurance Services, Inc. Year: 2016																																												
FDR EMPLOYEE INFORMATION																																												
EMPLOYEE FIRST NAME	EMPLOYEE LAST NAME	HIRE DATE																																										
Alyssa	Beinborn	06/25/12																																										
Ronald	Brooks	08/15/98																																										
Candi	Golden	08/22/11																																										
Julie	Henson	06/30/14																																										
Mitchell	Herman	08/01/05																																										
Robin	Montgomery	03/04/14																																										
Jeremie	Pielemeier	08/06/01																																										
Susan	Robinson	02/20/14																																										
Destiny	Rodgers	08/05/13																																										
Leslie	Stapp	06/19/08																																										



**Focused Audit of Medicare FDR – Eldercare Insurance Services
Corrective Action Plan (CAP)**

Audit Date: June 22, 2016

Your organization must complete a root cause analysis to determine why your findings occurred. Using your analysis, your organization must develop a written Corrective Action Plan (CAP) which details the actions you will take to correct your findings and prevent future reoccurrences. For example, training/retraining of staff on compliance requirements should be considered as one of your corrective actions to be taken for each of your deficiencies. In addition, your organization should understand the consequences of such findings, including, for example, potential contract termination for failure to implement a corrective action plan to Aetna’s satisfaction.

REQUIREMENT AND FINDING	ROOT CAUSE ANALYSIS RESULTS	CORRECTIVE ACTION PLAN	DATE DUE	DATE COMPLETED	COMMENTS																																							
<p>First Tier’s employees complete annual FWA Training. (§ 50.3.2; CY 2015 Final Rule CMS–4159–F published May 23, 2014)</p> <p>Eldercare has self-reported that they had not documented annual FWA training prior to an audit performed by their up-line in February 2016 and were in the process of correcting the identified deficiency during this audit. Eldercare was only able to provide evidence of the 2015 annual FWA training for 2 of the 10 sampled employees.</p>		<p>EIS adopted and implemented policies and procedures to remediate this deficiency in May 2016.</p> <p>EIS will provide to Aetna evidence to show annual FWA training for the following employees to validate the effectiveness of the policy by 9/22/16.</p> <table border="1" data-bbox="945 673 1459 1144"> <tr> <td colspan="3" data-bbox="945 673 1459 727">AGENCY NAME: Eldercare Insurance Services, Inc. Year: 2016</td> </tr> <tr> <td colspan="3" data-bbox="945 727 1459 760">FDR EMPLOYEE INFORMATION</td> </tr> <tr> <td data-bbox="945 760 1123 808">EMPLOYEE FIRST NAME</td> <td data-bbox="1123 760 1302 808">EMPLOYEE LAST NAME</td> <td data-bbox="1302 760 1459 808">HIRE DATE</td> </tr> <tr> <td>Alyssa</td> <td>Beinborn</td> <td>06/25/12</td> </tr> <tr> <td>Ronald</td> <td>Brooks</td> <td>08/15/98</td> </tr> <tr> <td>Candi</td> <td>Golden</td> <td>08/22/11</td> </tr> <tr> <td>Julie</td> <td>Henson</td> <td>06/30/14</td> </tr> <tr> <td>Mitchell</td> <td>Herman</td> <td>08/01/05</td> </tr> <tr> <td>Robin</td> <td>Montgomery</td> <td>03/04/14</td> </tr> <tr> <td>Jeremie</td> <td>Pielemeier</td> <td>08/06/01</td> </tr> <tr> <td>Susan</td> <td>Robinson</td> <td>02/20/14</td> </tr> <tr> <td>Destiny</td> <td>Rodgers</td> <td>08/05/13</td> </tr> <tr> <td>Leslie</td> <td>Stapp</td> <td>06/19/08</td> </tr> </table>	AGENCY NAME: Eldercare Insurance Services, Inc. Year: 2016			FDR EMPLOYEE INFORMATION			EMPLOYEE FIRST NAME	EMPLOYEE LAST NAME	HIRE DATE	Alyssa	Beinborn	06/25/12	Ronald	Brooks	08/15/98	Candi	Golden	08/22/11	Julie	Henson	06/30/14	Mitchell	Herman	08/01/05	Robin	Montgomery	03/04/14	Jeremie	Pielemeier	08/06/01	Susan	Robinson	02/20/14	Destiny	Rodgers	08/05/13	Leslie	Stapp	06/19/08	9/22/16		
AGENCY NAME: Eldercare Insurance Services, Inc. Year: 2016																																												
FDR EMPLOYEE INFORMATION																																												
EMPLOYEE FIRST NAME	EMPLOYEE LAST NAME	HIRE DATE																																										
Alyssa	Beinborn	06/25/12																																										
Ronald	Brooks	08/15/98																																										
Candi	Golden	08/22/11																																										
Julie	Henson	06/30/14																																										
Mitchell	Herman	08/01/05																																										
Robin	Montgomery	03/04/14																																										
Jeremie	Pielemeier	08/06/01																																										
Susan	Robinson	02/20/14																																										
Destiny	Rodgers	08/05/13																																										
Leslie	Stapp	06/19/08																																										



**Focused Audit of Medicare FDR – Eldercare Insurance Services
Corrective Action Plan (CAP)**

Audit Date: June 22, 2016

Your organization must complete a root cause analysis to determine why your findings occurred. Using your analysis, your organization must develop a written Corrective Action Plan (CAP) which details the actions you will take to correct your findings and prevent future reoccurrences. For example, training/retraining of staff on compliance requirements should be considered as one of your corrective actions to be taken for each of your deficiencies. In addition, your organization should understand the consequences of such findings, including, for example, potential contract termination for failure to implement a corrective action plan to Aetna’s satisfaction.

REQUIREMENT AND FINDING	ROOT CAUSE ANALYSIS RESULTS	CORRECTIVE ACTION PLAN	DATE DUE	DATE COMPLETED	COMMENTS																																							
<p>First Tier’s employees complete General Compliance Training within 90 days of hire. (§ 50.3.1; CY 2015 Final Rule CMS–4159–F published May 23, 2014)</p> <p>Eldercare has self-reported that they had not documented annual general compliance training prior to an audit performed by their up-line in February 2016 and were in the process of correcting the identified deficiency during this audit. Evidence to support annual employee compliance training was not available.</p>		<p>EIS adopted and implemented policies and procedures to remediate this deficiency in May 2016.</p> <p>EIS will provide to Aetna evidence to show annual General Compliance training for the following employees to validate the effectiveness of the policy by 9/22/16.</p> <table border="1" data-bbox="945 703 1461 1169"> <thead> <tr> <th colspan="3" data-bbox="945 703 1461 756">AGENCY NAME: Eldercare Insurance Services, Inc. Year: 2016</th> </tr> <tr> <th colspan="3" data-bbox="945 756 1461 786">FDR EMPLOYEE INFORMATION</th> </tr> <tr> <th data-bbox="945 786 1125 839">EMPLOYEE FIRST NAME</th> <th data-bbox="1125 786 1306 839">EMPLOYEE LAST NAME</th> <th data-bbox="1306 786 1461 839">HIRE DATE</th> </tr> </thead> <tbody> <tr> <td data-bbox="945 839 1125 868">Alyssa</td> <td data-bbox="1125 839 1306 868">Beinborn</td> <td data-bbox="1306 839 1461 868">06/25/12</td> </tr> <tr> <td data-bbox="945 868 1125 898">Ronald</td> <td data-bbox="1125 868 1306 898">Brooks</td> <td data-bbox="1306 868 1461 898">08/15/98</td> </tr> <tr> <td data-bbox="945 898 1125 927">Candi</td> <td data-bbox="1125 898 1306 927">Golden</td> <td data-bbox="1306 898 1461 927">08/22/11</td> </tr> <tr> <td data-bbox="945 927 1125 956">Julie</td> <td data-bbox="1125 927 1306 956">Henson</td> <td data-bbox="1306 927 1461 956">06/30/14</td> </tr> <tr> <td data-bbox="945 956 1125 985">Mitchell</td> <td data-bbox="1125 956 1306 985">Herman</td> <td data-bbox="1306 956 1461 985">08/01/05</td> </tr> <tr> <td data-bbox="945 985 1125 1015">Robin</td> <td data-bbox="1125 985 1306 1015">Montgomery</td> <td data-bbox="1306 985 1461 1015">03/04/14</td> </tr> <tr> <td data-bbox="945 1015 1125 1044">Jeremie</td> <td data-bbox="1125 1015 1306 1044">Pielemeier</td> <td data-bbox="1306 1015 1461 1044">08/06/01</td> </tr> <tr> <td data-bbox="945 1044 1125 1073">Susan</td> <td data-bbox="1125 1044 1306 1073">Robinson</td> <td data-bbox="1306 1044 1461 1073">02/20/14</td> </tr> <tr> <td data-bbox="945 1073 1125 1102">Destiny</td> <td data-bbox="1125 1073 1306 1102">Rodgers</td> <td data-bbox="1306 1073 1461 1102">08/05/13</td> </tr> <tr> <td data-bbox="945 1102 1125 1131">Leslie</td> <td data-bbox="1125 1102 1306 1131">Stapp</td> <td data-bbox="1306 1102 1461 1131">06/19/08</td> </tr> </tbody> </table>	AGENCY NAME: Eldercare Insurance Services, Inc. Year: 2016			FDR EMPLOYEE INFORMATION			EMPLOYEE FIRST NAME	EMPLOYEE LAST NAME	HIRE DATE	Alyssa	Beinborn	06/25/12	Ronald	Brooks	08/15/98	Candi	Golden	08/22/11	Julie	Henson	06/30/14	Mitchell	Herman	08/01/05	Robin	Montgomery	03/04/14	Jeremie	Pielemeier	08/06/01	Susan	Robinson	02/20/14	Destiny	Rodgers	08/05/13	Leslie	Stapp	06/19/08	9/22/16		
AGENCY NAME: Eldercare Insurance Services, Inc. Year: 2016																																												
FDR EMPLOYEE INFORMATION																																												
EMPLOYEE FIRST NAME	EMPLOYEE LAST NAME	HIRE DATE																																										
Alyssa	Beinborn	06/25/12																																										
Ronald	Brooks	08/15/98																																										
Candi	Golden	08/22/11																																										
Julie	Henson	06/30/14																																										
Mitchell	Herman	08/01/05																																										
Robin	Montgomery	03/04/14																																										
Jeremie	Pielemeier	08/06/01																																										
Susan	Robinson	02/20/14																																										
Destiny	Rodgers	08/05/13																																										
Leslie	Stapp	06/19/08																																										



**Focused Audit of Medicare FDR – Eldercare Insurance Services
Corrective Action Plan (CAP)**

Audit Date: June 22, 2016

Your organization must complete a root cause analysis to determine why your findings occurred. Using your analysis, your organization must develop a written Corrective Action Plan (CAP) which details the actions you will take to correct your findings and prevent future reoccurrences. For example, training/retraining of staff on compliance requirements should be considered as one of your corrective actions to be taken for each of your deficiencies. In addition, your organization should understand the consequences of such findings, including, for example, potential contract termination for failure to implement a corrective action plan to Aetna’s satisfaction.

REQUIREMENT AND FINDING	ROOT CAUSE ANALYSIS RESULTS	CORRECTIVE ACTION PLAN	DATE DUE	DATE COMPLETED	COMMENTS																																							
<p>First Tier screens employees against the OIG and GSA exclusion lists prior to hire. (§ 50.6.8)</p> <p>Eldercare has self-reported that they did not start OIG/SAM screening prior to hire until the new P&P Manual was adopted (5/16). Evidence to support consistent prior to hire screening is not available. Specifically, OIG & GSA screening of new hires (6/10 & 6/2) were provided however screening for the 6/2 hire was the same date as the date of hire.</p>		<p>EIS adopted and implemented policies and procedures to remediate this deficiency in May 2016.</p> <p>EIS will provide to Aetna evidence to show prior to hire OIG and GSA exclusion list screening for employees hired 6/22/16 – 9/22/16 to validate the effectiveness of the policy by 9/22/16.</p>	9/22/16																																									
<p>First Tier screens employees against the OIG and GSA exclusion lists monthly. (§ 50.6.8)</p> <p>Documentation of February 2016 monthly GSA screening did not include screening dates for 8 of the 10 sampled employees and no evidence of GSA screening for March was not available for 2 of the 10 sampled employees indicating an inconsistent screening process.</p>		<p>EIS adopted and implemented policies and procedures to remediate this deficiency in May 2016.</p> <p>EIS will provide to Aetna evidence to show annual General Compliance training for the following employees to validate the effectiveness of the policy by 9/22/16.</p> <table border="1"> <thead> <tr> <th colspan="3">AGENCY NAME: Eldercare Insurance Services, Inc. Year: 2016</th> </tr> <tr> <th colspan="3">FDR EMPLOYEE INFORMATION</th> </tr> <tr> <th>EMPLOYEE FIRST NAME</th> <th>EMPLOYEE LAST NAME</th> <th>HIRE DATE</th> </tr> </thead> <tbody> <tr> <td>Alyssa</td> <td>Beinborn</td> <td>06/25/12</td> </tr> <tr> <td>Ronald</td> <td>Brooks</td> <td>08/15/98</td> </tr> <tr> <td>Candi</td> <td>Golden</td> <td>08/22/11</td> </tr> <tr> <td>Julie</td> <td>Henson</td> <td>06/30/14</td> </tr> <tr> <td>Mitchell</td> <td>Herman</td> <td>08/01/05</td> </tr> <tr> <td>Robin</td> <td>Montgomery</td> <td>03/04/14</td> </tr> <tr> <td>Jeremie</td> <td>Pielemeier</td> <td>08/06/01</td> </tr> <tr> <td>Susan</td> <td>Robinson</td> <td>02/20/14</td> </tr> <tr> <td>Destiny</td> <td>Rodgers</td> <td>08/05/13</td> </tr> <tr> <td>Leslie</td> <td>Stapp</td> <td>06/19/08</td> </tr> </tbody> </table>	AGENCY NAME: Eldercare Insurance Services, Inc. Year: 2016			FDR EMPLOYEE INFORMATION			EMPLOYEE FIRST NAME	EMPLOYEE LAST NAME	HIRE DATE	Alyssa	Beinborn	06/25/12	Ronald	Brooks	08/15/98	Candi	Golden	08/22/11	Julie	Henson	06/30/14	Mitchell	Herman	08/01/05	Robin	Montgomery	03/04/14	Jeremie	Pielemeier	08/06/01	Susan	Robinson	02/20/14	Destiny	Rodgers	08/05/13	Leslie	Stapp	06/19/08	9/22/16		
AGENCY NAME: Eldercare Insurance Services, Inc. Year: 2016																																												
FDR EMPLOYEE INFORMATION																																												
EMPLOYEE FIRST NAME	EMPLOYEE LAST NAME	HIRE DATE																																										
Alyssa	Beinborn	06/25/12																																										
Ronald	Brooks	08/15/98																																										
Candi	Golden	08/22/11																																										
Julie	Henson	06/30/14																																										
Mitchell	Herman	08/01/05																																										
Robin	Montgomery	03/04/14																																										
Jeremie	Pielemeier	08/06/01																																										
Susan	Robinson	02/20/14																																										
Destiny	Rodgers	08/05/13																																										
Leslie	Stapp	06/19/08																																										



**Focused Audit of Medicare FDR – Eldercare Insurance Services
Corrective Action Plan (CAP)**

Audit Date: June 22, 2016

Your organization must complete a root cause analysis to determine why your findings occurred. Using your analysis, your organization must develop a written Corrective Action Plan (CAP) which details the actions you will take to correct your findings and prevent future reoccurrences. For example, training/retraining of staff on compliance requirements should be considered as one of your corrective actions to be taken for each of your deficiencies. In addition, your organization should understand the consequences of such findings, including, for example, potential contract termination for failure to implement a corrective action plan to Aetna’s satisfaction.

REQUIREMENT AND FINDING	ROOT CAUSE ANALYSIS RESULTS	CORRECTIVE ACTION PLAN	DATE DUE	DATE COMPLETED	COMMENTS
<p>First Tier retains training records of their employees for ten (10) years which includes key data elements such as time, attendance, topic, certificates of completion, and test scores as applicable. (§ 50.3.2)</p> <p>Although, Section 11.2 of the EIS P&P Manual indicates that agent records are retained for a minimum of 10 years. The policy does not define “agent records”. Records retention processes should outline retention of other non-agent employee files, including key data elements.</p>		<p>EIS will provide policy updates which define what information is included in “agent records” as well out outline retention of other non-agent employee files, including key data elements, by 9/22/16.</p>	9/22/16		
<p>First Tier oversees the compliance of their subcontractors (i.e., Downstream Entities) whom they use for Aetna’s Medicare product lines which ensures:</p> <ul style="list-style-type: none"> • Downstream Entities are compliant with Medicare regulations and requirements such as the Medicare Compliance Program Requirements (listed in above elements); • Downstream Entities are meeting performance expectations; AND • Corrective actions and disciplinary actions are enforced as appropriate. (§ 50.6.6) <p>Eldercare has identified Secure Insurance Group, LLC, as their sole downstream entity working on Aetna Medicare business at this time. Eldercare has self-reported that they have shared the FDR Guidelines with Secure Insurance Group, LLC in March 2016. EIS reported that they do not currently request Secure Insurance Group to attest to their compliance with Medicare requirements and the do not currently have auditing/monitoring processes, tools, templates in place.</p>		<p>EIS will develop, document and implement a Downstream oversight process and provide evidence (eg. Downstream attestation, auditing/monitoring activities, etc.) to validate the effectiveness of the policy by 9/22/16.</p>	9/22/16		