

Strategic Alternatives and Contingency Planning

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Fact to Consider

- **Enforcement will initially be by complaint.**
- **Severity will be based on effort.**
- **CMS does not want an industry collapse.**
- **CMS is aware that preparation is MUCH less than desired.**
- **CMS guidance focuses on:**
 - **Contingency Planning**
 - **Outreach**
 - **Testing**

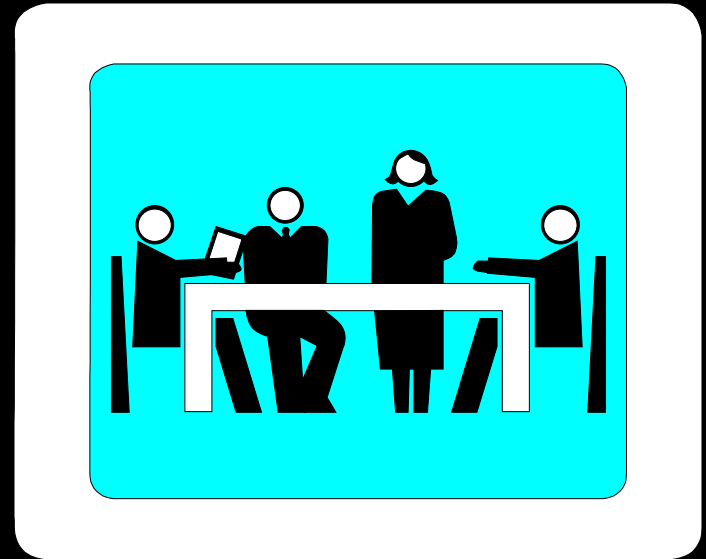


Immediate Considerations

Systems

Documentation

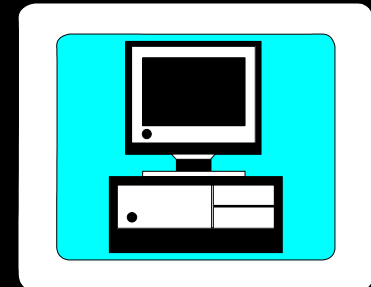
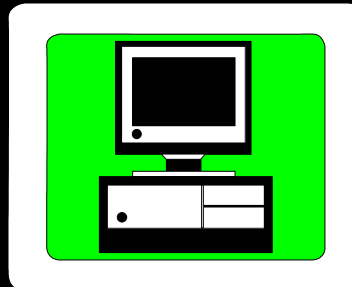
Notification



Protection

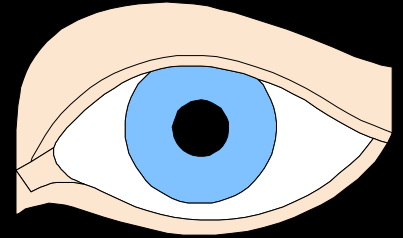
Systems

- “BUY DON’T BUILD” - There is not enough time to build, test, and implement EDI translation software.
- Parallel Systems - Plan to continue operating existing systems for an indefinite period of time. Continue to pay and get paid.
- Monitor the enforcement effort.



Documentation

(with an eye on protection)



- Document all efforts to update systems to become compliant.
- Document all implementation decisions.
The guides are not perfect and decisions are required to move forward.
- Identify all efforts to implement test procedures, including both compliance verification services and applications systems.
- Document all efforts to educate staff members, to include managers, technical support, sales and marketing, business managers, help desk and/or customer service.
- Document all efforts to education business partners.

Notification (Outreach)

- While not stopping existing systems (CMS desire) document all compliance violations and notify business partners (your protection.)
- Provide information on the availability of testing support and procedures.
- Develop and distribute information on companion guides.
- Request business partners provide timeline when they will be compliant.
- CONTINUE PERIODIC NOTIFICATION UNTIL CMS GUIDANCE AND ENFORCEMENT BECOMES CLEARER.
- Document all Notification correspondence.