

**National Medicare Prescription Drug Conference**  
**February 25-27, 2004**

**Topic:** Compliance Implications of the New Medicare Prescription Drug Legislation

**Discussion Points:**

- ❖ Enrollment Process. What will providers be expected to do to ensure (a) they are enrolling the correct person, (b) individuals are not enrolled in multiple plans, and (c) low-income individuals receive the correct subsidy, etc.?
- ❖ Oversight and Monitoring of PBMs. Issues and concerns for regulatory and enforcement oversight functions.
- ❖ Misuse of Medicare Prescription Drug Discount Card. What level of enforcement is likely for providers offering interim prescription discount cards?
- ❖ Pharmacies setting up compliance programs. What should pharmacies be doing at this time?
- ❖ Process for developing internal controls. What are some of the internal controls that pharmacies should be working on?
- ❖ Billing Compliance. Accurate submission of claims will have to be done in accordance with billing requirements. What should providers be doing to ensure that this will be done?
- ❖ Educating Beneficiaries. How can this standard be met by providers?
- ❖ Electronic Prescribing Standards for 2008. What does the increase in compliance for formularies mean? How can a provider meet the Safe Harbor requirements?
- ❖ Cost and Utilization Management Programs. What are some of the compliance program requirements for PDP's to control fraud, waste, and abuse?
- ❖ Quality Assurance Programs. What sort of quality assurance is needed under the Act.
- ❖ Medication Therapy Management Program. What must providers do to meet this standard?

- ❖ Grievance Mechanisms. What sort of grievance processes must providers have to be in compliance?
- ❖ Periodic Audits of financial statements and records of PDP sponsors. What sort of financial audits are needed to be in compliance?
- ❖ Performance Measures. What sort of measures are going to be used?