

**Medicare Plan Performance Warning Information: Guide 1 (i)
Audits and Letters
Intermediary IDI Discussion Guide (90-minute online interviews)**

Interviewer: _____

Participant: _____

Date/Time: _____

Objectives

- Gauge reactions to and interest in information on Medicare plan audits.
- Understand how intermediaries may use audit information when discussing plan decisions with beneficiaries.
- Gain insights on best ways to share plan audit information with intermediaries.
- Understand experience with appeals letters.

Introduction (3 min)

Thank you for agreeing to speak with me today. My name is _____ and I'll be leading our conversation. This is opinion research, which means there are no wrong answers. I am interested in everything you have to say. Since we are talking about your opinions, you are the expert.

Before we get started, there are a few things I want to mention. First, I am an independent researcher. You will not offend me or get me in any trouble. My only goal is to hear your honest opinions. So please be as open and candid as possible.

We have a number of questions to get through and a few things to look at and read. So, if at some point I ask that we move on, it's because I want to make sure that we finish on time. It's not because I am not interested in what you have to say.

I am recording our conversation so I don't miss anything. The recording is confidential and is not shared outside the research team. There are also other people watching this interview to help me take notes and to understand what was said. Ultimately, the findings from this interview will be combined with other interviews we're conducting, and we'll write a report with some recommendations. Your name won't be used in the report.

The sponsor of this study is the Centers for Medicare and Medicaid Services, specifically, the Medicare program, or CMS. I do not work for the Medicare program.

Do you have any questions before we get started?

Warm-up (7 min)

I like to start by getting to know more about you.

1. How long have you been working as/with a [SHIP counselor / broker / advocacy group]?
 - a. [IF A YEAR OR LESS]: Previous to this role, have ever you done similar work in some other capacity?
 - b. What does that work look like on a day-to-day basis [PROBE TO UNDERSTAND THEIR ENGAGEMENT WITH BENEFICIARIES]
2. What do you find most challenging about this work? [KEEP BRIEF]
3. What are some of the most common things you get asked about by beneficiaries/beneficiaries care about? [LISTEN FOR QUALITY OR PERFORMANCE ISSUES]
 - a. What are some of the most common concerns that beneficiaries have about Medicare plans? [PROBE TO UNDERSTAND ISSUES RELATED TO QUALITY OR PERFORMANCE]
4. In general, how could you determine if a Medicare Advantage or prescription drug plan is “good” or not? By “good,” I don’t mean affordable or if a beneficiary’s doctor participates, I mean if the quality of the plan itself is good, or how well it operates or serves beneficiaries? I’ll refer to this as “plan performance.” [IF RESPONDENT REFERS TO HEALTHCARE QUALITY, CLARIFY THIS IS REFERRING TO PLAN OPERATIONS AND HOW WELL THE PLAN CONDUCTS THOSE.]

Audit Information: Introduction (20 min)

Today we are going to talk about how Medicare monitors plans and collects information on the performance of plans.

5. To begin, what do you know about how Medicare monitors plan performance? What kind of activities would you expect it to conduct?
 - a. What would you expect or hope Medicare would share with intermediaries who help beneficiaries, like yourself?
 - b. What would you expect or hope Medicare would share with beneficiaries?
 - c. Do you think sharing any information on this topic would help beneficiaries to have more trust in Medicare? IF YES: What would be most helpful to share?
6. I want to share some information with you about how Medicare monitors plan performance. [SHARE OVERVIEW TO INCLUDE AUDITS, ENFORCEMENT ACTIONS, AND OTHER PLAN PERFORMANCE INDICATORS]

- a. What is your reaction to this information? How much of it was familiar to you already?
 - b. How have you learned about this in the past?
7. Now I want to share some information with you specifically about plan audits. [SHARE MORE DETAILED INFORMATION ON AUDITS, INCLUDING THAT NOT ALL ARE AUDITED, THE FREQUENCY OF AUDITS, COMPONENTS OF AN AUDIT, AND THAT AUDITS ARE DONE AT THE PARENT ORGANIZATION LEVEL (AND WHAT THAT MEANS)]
- a. What is your reaction to this information? How much of it was familiar to you already?
 - b. How have you learned about this in the past?
8. In general, how interested are you in audit information about the parent organizations of Medicare plans? Please rate your interest on a scale from 1, not at all interested, to 10, very interested. Please explain your answer.
- a. What most interests you about audit information? Why?
 - b. How, if at all, would you use this information (e.g., general interest, informing discussions with beneficiaries, etc.)?
 - c. When might you use it?

Audit Information: Examples and Details (40 min)

Now we are going to look at some of the information Medicare currently shares about audits.

9. I want to get your reaction to some high-level information across all audits. I will share several parts of a national report with you and get your reactions. This is a real report from [YEAR]. [SHOW MORE RECENT VERSION IF AVAILABLE <https://www.cms.gov/files/document/2021-program-audit-enforcement-report.pdf> READ ACCOMPANYING INFORMATION TO DESCRIBE EACH FIGURE]
- a. *Figure 1*: What is your reaction to this information?
 - b. *Figure 2*: What is your reaction to this information?
 - c. *Figure 6*: What is your reaction to this information?
10. What questions do you have about this information?
11. Overall, how helpful is this kind of information as you think about your work and/or educating and assisting beneficiaries? Please rate how helpful it is on a scale from 1, not at all helpful, to 10, very helpful. Please explain your answer.
- a. What's most helpful? What's least helpful?
 - b. Would having this kind of information be useful in any way to your work?
 - c. Would having this kind of information change how you (or someone else) assists beneficiaries when they are making decisions on a plan? Why or why not?

- i. Would having this kind of information impact how you viewed a plan's performance?
 - d. How, if at all, would you use this information (e.g., general interest, informing discussions with beneficiaries, advocacy work, etc.)?
 - e. When would you use this information?
 - f. Is this kind of information official/impartial enough such that you could/would share this information with a beneficiary to advise them about a plan if you had concerns?
12. Now I want to share some audit information in a different format. [SHOW REFORMATTED INFORMATION INCLUDING NAME OF PLAN, YEAR FORMED, ENROLLMENT, NAME OF PARENT ORG, DATE OF LAST AUDIT (IF ANY), AND WHETHER ANY ENFORCEMENT ACTIONS RESULTED FROM MOST RECENT AUDIT]
- a. *Example with no recent audit:* What is your reaction to this information?
 - b. *Example with recent audit, no findings:* What is your reaction?
 - c. *Example with recent audit, with findings:* What is your reaction?
13. What questions do you have about this information?
14. Overall, how helpful is this kind of information as you think about your work and/or educating and assisting beneficiaries? Please rate how helpful it is on a scale from 1, not at all helpful, to 10, very helpful. Please explain your answer.
- a. What's most helpful? What's least helpful?
 - b. Would having this kind of information be useful in any way to your work?
 - c. Would having this kind of information change how you (or someone else) assisted beneficiaries when they are making decisions on a plan? Why or why not?
 - i. Would having this kind of information impact how you viewed a plan's performance?
 - d. How, if at all, would you use this information (e.g., general interest, informing discussions with beneficiaries, etc.)?
 - e. When would you use this information?
 - f. Is this kind of information official/impartial enough such that you could/would share this information with a beneficiary to advise them about a plan if you had concerns?
15. Where would you expect to learn about this kind of audit information? Why?
- a. IF NOT DISCUSSED: How might you expect to find it?
 - b. Where do you think beneficiaries would expect to learn about this kind of audit information? Why?
16. Now I want to share some examples of how the type of information we've been talking about might be shared. [SHOW EXAMPLES OF WAYS TO SHARE INFORMATION, INCLUDING AN OVERVIEW OF PLAN FINDER WEBSITE FOR THOSE NOT FAMILIAR; KEEP IN MIND PURPOSE OF PLAN FINDER VS. OTHER SOURCES LIKE MEDICARE & YOU TO EXPLORE WHAT THE BEST PLACE IS FOR THIS TYPE OF INFORMATION]

What is your reaction to:

- a. *Language on the Plan Finder website*
- b. *Indicators or icons on the Plan Finder website*
- c. *Links from Plan Finder to a separate website with more information*
- d. *Information hosted on a separate website not directly linked from Plan Finder*
- e. *Others?*

17. Which of these options to share information is most helpful? Why? Who do you think the target audience of this information should be?
- a. Does it depend on the type of information being shared? How so?
 - b. Does it depend on the engagement level of the beneficiary? [PROBE TO UNDERSTAND IF WHERE OR HOW INFORMATION IS DISPLAYED WOULD DIFFER BASED ON WHETHER A BENEFICIARY IS MORE OR LESS ENGAGED]
 - c. Is there some other way Medicare could communicate information related to audits that would be helpful to your work or for assisting beneficiaries?
 - d. Thinking of your own work and all the information you (or your organization) share, when, if ever, would you share audit information with beneficiaries? Why?

Appeals Letters (15 min)

Thank you. Now I want to briefly get your feedback on appeals letters.

18. [SHOW SAMPLE LETTER FOR PART C, BASED OFF MODEL NOTICES AT <https://www.cms.gov/Medicare/Appeals-and-Grievances/MedPrescriptDrugApplGriev/PlanNoticesAndDocuments>]
- a. Has a beneficiary ever brought you an appeals letter like this/raised concerns about appeals with your organization?
 - i. IF YES: What questions or comments did they have about this letter/appeals?
 - ii. Overall, how might a letter like this be improved so it was more helpful for beneficiaries?
 - iii. What about the communications process around appeals could be improved, e.g. speed, follow-up, the links and guidance the letter includes for beneficiaries to educate themselves, how the letter references the SHIP program or other assistance, etc.?
 - b. What questions, if any, have you gotten from beneficiaries on the appeals process?
 - c. [IF APPLICABLE] Have you ever worked with a beneficiary to file an appeal?
 - i. IF YES: How often does this happen? What kind of information would be helpful for you?

Wrap-up (5 min)

TIME ALLOWING: Before we wrap up, I'm going to check to see if there are any additional questions for you from anyone else on the team. [CHECK FOR QUESTIONS]

19. This has been really helpful. Thanks so much for participating in this project. Do you have any other thoughts or comments you'd like to share?

We really appreciate your assistance. Have a great day.

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