

RFP: CMS Data Validation and Compliance Program Effectiveness Auditing Services

RFP Responses Due: May 1, 2026

Bidder Questions and Health Plan Responses

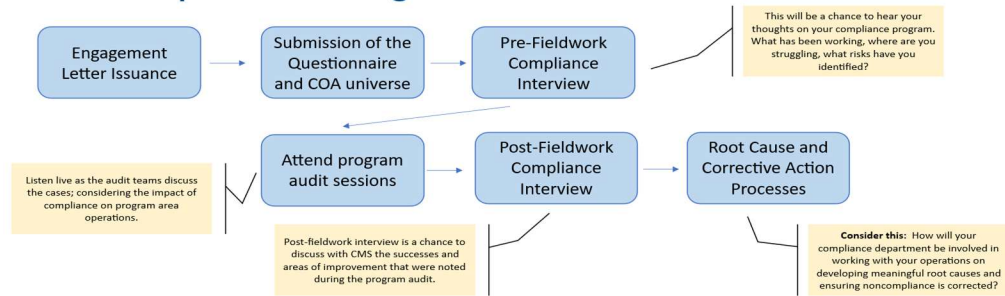
Page 23: Under Compliance Program Effectiveness (CPE) Audit, Health Plan of San Joaquin (HPSJ) indicates that the vendor must provide independent CPE auditing services, including “universe validation for required CPE audit areas (e.g., CDAG, ODAG, SARAG, compliance universes, FDR oversight).” CDAG, ODAG, and SARAG universes are not part of the Compliance Program Effectiveness (CPE) domain. ***Please clarify whether HPSJ is seeking a full program audit or an audit of the single CPE domain, or whether HPSJ would like to incorporate universe validation testing for some or all of CMS’s program audit domains. If so, please specify which domains should be included.***

Health Plan Response: *Please include pricing for universe validation for all areas in the CMS Program Audit Domain (ODAG, CDAG, Part D FA, COA) including focus on full program audit domains. Please describe what your CPE Domain captures in 2026 mock audits.*

Page 23: Under Compliance Program Effectiveness (CPE) Audit services, Health Plan of San Joaquin (HPSJ) indicates that the vendor must provide independent CPE auditing services, including “***tracer case review methodology consistent with CMS protocols.***” On November 20, 2025, CMS communicated its revisions to the industry regarding the evaluation of compliance program effectiveness. Further, in the Technical Audit Approach section on page 9, reference is made to conducting the audit alignment to the protocols based on the CY Q1 2026 CMS Compliance Officer Call. Rather than reviewing prepared tracer samples, CMS is having in-depth discussions with the plan about how it prevents, detects, and corrects noncompliance in other program audit areas. ***Please clarify whether HPSJ prefers that the CPE audit be conducted as previously published within the RFP, for example, to include 6 tracer samples, or according to the recent CMS guidance listed above.***

Health Plan Response: *HPSJ/MVHP would like to follow the CMS 2026 Audit approach as outlined in the Q1 2026 Compliance Officer (see screenshots below). Please describe what your CPE Domain captures in 2026 mock audits.*

Compliance Program Effectiveness



Compliance Program Effectiveness

Moving From:

- Tracer reviews focused on past issues
- Focusing on the structure of the compliance program versus the effect/outcome of compliance
- Focusing on “misses” instead of discussing “successes”



Moving to:

- Collaboration toward a shared goal of an effective compliance program
- Having in-depth discussions on potential strengths and weaknesses in order to proactively drive improvements
- Tying compliance discussions directly to the other audited program areas in real time

