(Attachment IV)
Organizational Structure and Governance PowerPoint Presentation Template

Instructions for Completion:

- Please include specific information using this PowerPoint template as a guide and responding to the specific requests listed within the template. The presentation focuses on various aspects of your organization as they relate to the operation and effectiveness of your compliance program.

- This presentation is an important part of your documentation submission. You must provide at least the information requested in the template; however, you are not limited to providing only this information, and we fully expect you to tailor the presentation to your specific organizational structures and the operation of your compliance program.

(Attachment IV)
Organizational Structure and Governance PowerPoint Presentation Template

- [Sponsoring Organization Name]
- [Date]

Table of Contents

- Overview
- Corporate Structure
- Corporate Governance and Accountability
- Medicare Operational Areas
- Board Membership, Senior Management
- Compliance Reporting Structures

Overview

- History (including specific milestones)
- Organization's line of business
- Service Area-Geographic Footprint
- For-Profit or Non-Profit
- Publicly-Traded or Privately-Held
- Total Membership
- Number of MA/PDP covered lives vs. Total covered lives for all lines of business

Overview

- Total number of employees
- Operational locations
- Number of staff at each location
- Number and percentage of staff dedicated to Medicare C/D Operations
- Recent acquisitions and/or mergers (including novations) (provide dates)
- Percentage of business Medicare, Medicaid, Commercial
- Does your organization serve as a Subcontractor or FDR to other Sponsoring Organization(s) (PBM, etc.)

Overview

Revenue by Lines of Business

Product	YTD 2013	2014(MM/YYTD)	2014 Annualized Total Revenue
Commercial			
MA/MAPD			
PDP			
Other (Please Specify)			
Total			

Overview

Medicare Enrollment and Enrollment Growth

Year	December 31 Membership	Membership Growth	% Growth
2011			
2012			
2013			
2014			

Corporate Structure

- Provide organizational charts depicting corporate structure and where the Medicare line of business fits into your overall business.

- Provide individual organization charts and flow charts of Part C and Part D operational areas and processes (i.e., formulary administration, coverage determinations, and appeals, grievances, organizational determinations, Part C access, CTM, enrollment, delegation/vendor oversight, agent/broker oversight, compliance program , etc).

Corporate Governance and Accountability

- Demonstrate your corporate governance structure, including governing body and accountable senior management responsible for Medicare Parts C/D operations and compliance.
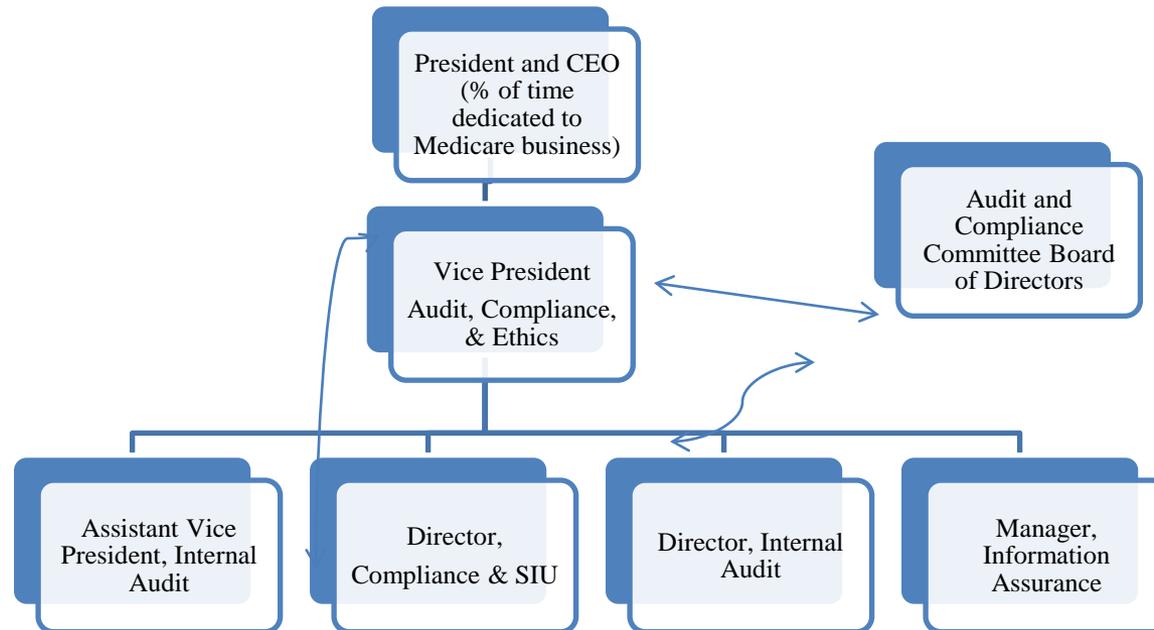
Corporate Governance and Accountability

- **Percentage of time senior executives dedicate to Medicare vs. Other Lines of business (list)**

Name	Position	% Time Medicare
John Doe	CEO	35%

Medicare Operational Areas

- Demonstrate your Compliance Program/Department organizational structure, including senior management to whom Compliance Officer reports (include names of individuals, titles, and locations).

- How does the Compliance Department interact with the Medicare C/D Operational Business Units?

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                    VP
                Government
                Operations
                     |
                 Medicare
                Compliance
                 Officer
        ┌────────────┼────────────┬────────────┐
   Compliance    Compliance   Compliance    Compliance
   Specialist    Specialist    Training      Assistant
                              Specialist
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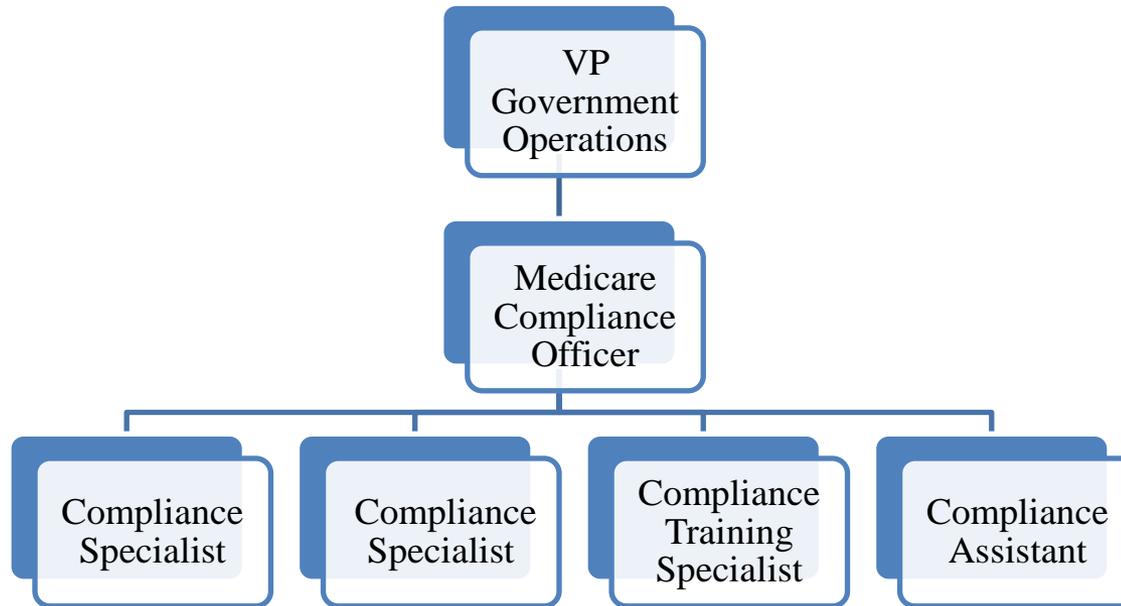
Board Membership/Senior Management

- Identify (by name)* members of the Board of Directors, and briefly summarize their professional experience.

- If the organization does business with any Board members or Board members' relatives, please identify and briefly summarize the nature of the business relationship.

- Are any of the Board members and/or members of senior management related to each other? If so, please indicate the nature of the relationship.

- Identify senior management responsible for the Medicare line of business.

- Identify any Board Members/Senior Management appointed within the past 6 months.

* If the entity holding the Medicare contract is a subsidiary, identify both the members of the board of directors of the parent entity as well as those of the subsidiary contracting entity.

Compliance Reporting Structures

- Provide a chart demonstrating Medicare Compliance Reporting Structures (including Compliance Officer(s), Compliance Committee, and senior management, and their reporting relationships among each other and to the governing body).

- If there is a Board-level committee that conducts day-to-day oversight on behalf of the full Board, please indicate, and identify members by name.

- If the compliance reporting structures have changed recently, please identify the changes that have been made and when they were made.

- Please describe or provide a work flow demonstrating how and when reports regarding the compliance program are provided to the CEO and Board or board committee.

Compliance Issue Resolution Process

• Provide a chart demonstrating the compliance issue/potential FWA issue resolution process (i.e. receipt process, who referred to, who initiates investigations, referred to operational areas?, corrective action, ongoing monitoring, tracking, etc.

• Please identify all sources used to identify compliance and potential FWA issues (i.e. hotline, audit/monitoring results, emails, management, etc.

Delegated Entity Oversight

- Provide an outline of your system and process for oversight of delegated entities (i.e., decentralized or centralized operations,

- Identify the business units are involved or responsible for delegated oversight?

- Describe how delegated entities are monitored for compliance program requirements (i.e. how does your organization ensure delegated entities (FDRs) are satisfying training and education requirements, exclusions checking, etc.)

- Which delegated entities present the most risk to your organization and beneficiaries?

- Identify your PBM and functions performed on the Sponsor's behalf.

Compliance Program Effectiveness

• Describe your organization's process for monitoring and auditing the effectiveness of your Compliance Program.