Integral Healthcare Solutions

CMS Program Audit Readiness Consulting for Medicare Advantage and Part D Sponsors

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What to have ready

These items shorten the readiness assessment. Each ties to the Process Overview (updated November 2025) or the CMS-10717 protocols.

- A list of the program areas you expect CMS to audit and the owner of each, matched to the CMS-10717 protocol files (CMS-10717 [https://www.cms.gov/files/zip/cms-10717.zip]).
- For each area, the system and report that would produce the universe, since you will have at most three attempts to submit complete and accurate universes, and CMS says three "may not always be feasible" (Phase I [https://www.cms.gov/files/document/program-audit-process-overview.pdf]).
- A sample universe pulled from your systems now, to test against the protocol record layout.
- Your compliance oversight activities for the year. The CPE protocol says "CMS will collect a universe of compliance oversight activities" (CPE protocol [https://www.cms.gov/files/zip/cms-10717.zip]).
- Your compliance officer's risk assessment and monitoring plan, and FDR oversight records. Both are listed topics for the "Preliminary Compliance Officer Interview" (CPE protocol [https://www.cms.gov/files/zip/cms-10717.zip]).
- A named owner and template for impact analyses, which are due "Within 10 business days of the request" (Phase II [https://www.cms.gov/files/document/program-audit-process-overview.pdf]).
- A process for review and comment on a draft report, since "The Sponsoring organization has 10 business days to respond to the draft audit report" (Phase III [https://www.cms.gov/files/document/program-audit-process-overview.pdf]).
- A corrective action plan template, since CAPs "are due within 30 calendar days of final audit report issuance" (Process Overview [https://www.cms.gov/files/document/program-audit-process-overview.pdf]).