



MEDICARE-MEDICAID COORDINATION OFFICE

DATE: February 19, 2015

TO: Medicare-Medicaid Plans

FROM: Sharon Donovan, Director, Program Alignment Group
Lindsay Barnette, Acting Director, Models, Demonstrations, and Analysis Group

SUBJECT: Request for Comments on Medicare-Medicaid Plan Provider and Pharmacy Directory Requirements

As part of our ongoing collaborative efforts to refine marketing materials for enrollees in Medicare-Medicaid Plans (MMPs), we have designed a survey seeking your input on some of the provider listing requirements in the Provider and Pharmacy Directory model template. We would like to make the directory more useful to readers by clarifying information MMPs are required to provide. We also would like to ensure MMPs have these clarifications well in advance of the start of marketing for CY 2016 to ensure full compliance with the provisions regarding provider directories in the three-way contracts.

Some of the current requirements contain vague or imprecise language, which makes them difficult to understand and fulfill. For example, terms such as *cultural capabilities*¹, *skilled medical interpreters*², *translation services*³, and *accessible by public transportation*⁴ are subject to more than one interpretation and may not convey information most helpful to those who use the directory. Please refer to provider listing requirements beginning on page 8 in the CY 2015 Provider and Pharmacy Directory national model template that accompanies this memo and in state-specific models found on our website at: <http://www.cms.gov/Medicare-Medicaid-Coordination/Medicare-and-Medicaid-Coordination/Medicare-Medicaid-Coordination-Office/FinancialAlignmentInitiative/InformationandGuidanceforPlans.html>.

¹See DHHS Office of Minority Health <http://minorityhealth.hhs.gov/>; National CLAS Standards in support of health equity in diverse communities, <http://minorityhealth.hhs.gov/omh/browse.aspx?lvl=2&lvlid=53>; National Standards for Culturally and Linguistically Appropriate Services in Health Care <http://minorityhealth.hhs.gov/assets/pdf/checked/executive.pdf>.

²See the National Council on Interpreting in Health Care (NCIHC): <http://www.ncihc.org/> and <http://www.ncihc.org/faq-for-translators-and-interpreters>.

³See the National Council on Interpreting in Health Care (NCIHC): <http://www.ncihc.org/faq-for-translators-and-interpreters>.

⁴See ADA Title III Technical Assistance Manual <http://www.ada.gov/taman3.html> and <http://www.access-board.gov/guidelines-and-standards/buildings-and-sites/113-ada-standards/background/adaag/422-a-guide-to-adaag-provisions> for more information and definition of "accessible route."

An online Internet application is available to support the collection of your feedback: <https://cmsgov.wufoo.com/forms/mmp-provider-directory-requirements/>. Survey participants have the option to remain anonymous.

As a reminder, the survey website is accessible via the Internet. HPMS access is **not** required. **NOTE:** If you encounter the following error message while completing the survey, you must clear cookies and then resubmit the form: *“There was a problem with your submission. Unable to create a new entry.”*

The survey will close on **Thursday, March 5, 2015, at 5:00 p.m. Eastern Time**. We will consider survey responses as we finalize the CY 2016 Provider and Pharmacy Directory model templates for each State’s MMPs in spring 2015.

If you have any questions about this memo, please send an email to the MMCO resource mailbox at MMCOCapsModel@cms.hhs.gov. We appreciate your participation and look forward to your input.