



Financial Services Group

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Alert: SPAPs and ADAPs to Retain and Report 36 months of Eligibility Data

Effective immediately, State Pharmaceutical Assistance Programs (SPAPs) and AIDS Drug Assistance Programs (ADAPs) should begin retaining eligibility history for all enrollees for 36 months, including for enrollees no longer enrolled, and reporting this information on the monthly eligibility file.

Background

Although claims for Medicare-covered services must be filed no later than 12 months for the claim's date of service, Medicare Part D regulations at 42 CFR 423.466(b) require Part D sponsors to coordinate benefits with SPAPs, ADAPs and other entities providing prescription drug coverage for a period of 3 years. It is a common occurrence for sponsors to receive information that necessitates the re-processing of a previously adjudicated Part D claim. When this occurs and a supplemental payer was involved in the claim, historical eligibility information on the supplemental coverage must be available to support the sponsor's coordination of benefits because the re-processing may require the adjustment of amounts paid by the supplemental payer. Therefore, SPAPs and ADAPs should retain eligibility history for all enrollees for 36 months, including for enrollees no longer enrolled, and report this information on the monthly eligibility file. CMS guidance has been revised to reflect this longer timeframe.

CMS is aware that some SPAPs and ADAPs may not currently retain 3 years of eligibility history for their enrollees. Those programs that do have this information should begin reporting it on the monthly input files as soon as possible, if they are not already doing so. All others should initiate whatever systems changes are necessary to begin retaining and reporting 36 months of eligibility data for all enrollees. We encourage you to act as expeditiously as possible to capture and report the information required to support Part D coordination of benefits.

As an additional note, if your program changes pharmacy benefits processors (or changed processors during the last 36 months), your monthly eligibility input files must include 3 years of historical eligibility information, including information from former and new processors reflecting correct 4Rx data for both processors (with no overlap). This may require providing historical eligibility information from the former processor to the new processor to include on the monthly file.

For further guidance on Part D Prescription Drug Policy, please refer to Chapter 14 of the Prescription Drug Benefit Manual found at: <https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovContra/PartDManuals.html>. You may also direct any comments or inquiries via e-mail to CMS at PartDpolicy@cms.hhs.gov.

The information included in this Alert supersedes the applicable language in the SPAP Data Sharing Agreement User Guide (Version 10.4) and the ADAP Data Sharing Agreement User Guide (Version 1.0) and will be incorporated into subsequent versions of these User Guides.