



Overview of the PACE Application Process



Debbie Van Hoven

Division of Medicare Advantage
Operations

Medicare Drug & Health Plan Contract
Administration Group

Arianne Spaccarelli

Division of Benefit Purchasing and
Monitoring

Medicare Drug Benefit and C&D Data
Group

February 6, 2019

Application Process Overview

- Initial and Expansion Automated Applications
- Notice of Intent to Apply (NOIA)
- Access to CMS Systems
- State Application Process for PACE
- Key Changes to Application for 2019
- Completing and Submitting PACE Application
- Important Reminders!
- PACE Part D Application
- Request for Additional Information
- Important Dates

Open Captioning Area

Automated Submission for Initial and Service Area Expansion Applications

- All PACE applications, both initial and service area expansion (SAEs) are automated
- Applications are submitted via the Health Plan Management System (HPMS)
- The 2019 Initial/SAE PACE application is posted on the CMS webpage at:
<https://www.cms.gov/Medicare/Health-Plans/PACE/Overview.html>

Open Captioning Area

NOIA Submission for Initial PACE Applications

- Submit NOIA request form to the DMAO portal to obtain access to HPMS systems
- Use the NOIA form (Attachment A of the January 31, 2019 HPMS memo that addressed PACE Application Guidance)
- CMS responds to the NOIA request with a pending contract number

Open Captioning Area

Access to CMS Systems

- Applicant uses the pending contract number to request access to CMS systems
- Process may take 2-4 weeks
- For instructions on obtaining CMS User ID and password and applicable timeframes, see Attachment B of the January 31, 2019 HPMS memo

Open Captioning Area

State Application Process for PACE

- Varies by state
- Follow the specific application process for the State in which the organization is applying to operate a PACE program
- Upload the State assurance (as required by 42 CFR §460.12(b)) and documentation of other state processes as required for application

Open Captioning Area

Key Changes to Application for 2019

- Overall, minor modifications for 2019
- Added applicable regulatory requirements to the instructional language in the upload template documents
- Clarified that the governing body document for both initial and service area expansion applications must include a participant representative
- Clarified that State Readiness Review (SRR) may be submitted when responding to a request for additional information if not available at the time of application
- Some corrections to regulatory citations referenced in certain attestations

Open Captioning Area

Important Reminders

- Applications must be completed and submitted within the same quarter
- Ensure the county/zip code and PACE center site address are reflected correctly in HPMS and align with the information in the State Assurances document
 - Inconsistent information may result in need to withdraw and resubmit

Open Captioning Area

Important Reminders (cont.)

- Be sure to use the download file templates and adhere to instructions included for required document uploads
- The Medicare and State Medicaid Capitation Payment document must include currently-approved **State Medicaid** Capitation rates (pending or TBD information not acceptable)
- CMS will not review documents provided that are not required as part of the application (e.g., letter templates, forms)
- May not submit an expansion application if one is currently pending

**Open Captioning Area**

Important Reminders – Fiscal Soundness

- Applicants without subordinated /guaranteed debt or reserve requirements or other financial requirements established by the applicable state should respond “N/A” to applicable attestations
- *No upload requirements for SAE applicants unless requested as part of RAI!*

Open Captioning Area

Completing and Submitting PACE Application

- Complete attestations and upload documentation, including required state assurance and other documentation required of the applicable state (in zipped files as applicable)
- Hit the “Final Submit” button on the specified quarterly submission date

Open Captioning Area

Failure to Hit “Final Submit”

- If an applicant fails to hit “Final Submit” on the specified date, the pending application will no longer be available, and
- A new application may only be submitted as part of a subsequent quarterly submission window

**Open Captioning Area**

PACE Part D Application – Initial PACE Application Only

- Submit PACE Part D application in HPMS
 - The 2019 PACE Part D application is posted on the CMS webpage at:
https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovContra/RxContracting_ApplicationGuidance.html
- Must follow the same application deadlines for PACE application

Open Captioning Area

PACE Part D Application – Important Tips

- Applicants must submit contracts for any contractor performing Part D functions, including negotiating rebates, contracting with pharmacies, or providing Long Term Care Pharmacy services.
- Contracts must comply with ALL requirements outlined in the relevant contract crosswalk.

Open Captioning Area

PACE Part D Application – Important Tips (cont.)

- Make sure the page numbers referenced in the crosswalk reflect the .pdf file page numbers for the uploaded contract or template.
- Make sure the executed contracts reference the legal entity applying for a Part D contract.

Open Captioning Area

Request for Additional Information

- If required, a Request for Additional Information (RAI) will be generated through the HPMS system
- HPMS will send an email with the RAI to the applicant within the first 90-day review period (or 45-day period, as applicable, for SAE applications)
- RAI will indicate issues with the application information and include requests for additional information pertaining to both the PACE and Part D applications, as applicable

Open Captioning Area

Response to the RAI

- When ready to submit a ***complete*** response to the RAI, notify CMS by submitting a request to the PACE portal at <https://dmao.lmi.org> and select the “Operations” link
- Applicant must answer all questions and upload any additional requested materials, including the State Readiness Review (SRR), as applicable
- Once all required information in response to the RAI has been uploaded to HPMS, be sure to click the “Final Submit” button, which will start the second and final 90-day (or 45-day) review period

Open Captioning Area

Important Dates

Actions	Application Submission Dates	Submission Deadlines
NOIA submission for new PACE organizations to ensure timely access to CMS systems, including HPMS.	1st quarter	January 1 to January 31, 2019
	2nd quarter	April 1 to April 28, 2019
	3rd quarter	July 1 to July 31, 2019
	4th quarter	October 1 to October 31, 2019
Request HPMS access as a new user	1st quarter	January 31, 2019
	2nd quarter	April 1 to April 30, 2019
	3rd quarter	July 1 to July 31, 2019
	4th quarter	October 1 to October 31, 2019
Initial and SAE Application Submission Dates -- Please note that when submitting an application an applicant must hit "Final Submit" on the quarterly submission deadline by 8:00 pm ET for the application to be considered by CMS.	1st quarter	March 29, 2019
	2nd quarter	June 28, 2019
	3rd quarter	September 27, 2019
	4th quarter	December 27, 2019

Resources

- January 31, 2019 HPMS memo, titled “Release of and Training on the 2019 PACE Application” accessible in HPMS
- A paper version of the 2019 application is available for reference at <https://www.cms.gov/Medicare/Health-Plans/PACE/Overview.html> (along with this training presentation)
- Online Application User Manual –available within HPMS. Please see the Documentation tab at the bottom of the green column on the left side of the screen
- Questions may be submitted in the portal at <https://dmao.lmi.org> under the PACE tab
- A list of State websites for additional information on PACE: <https://www.medicaid.gov/medicaid/ltss/downloads/integrating-care/state-website-list.pdf>

Open Captioning Area