



CENTER FOR DRUG and HEALTH PLAN CHOICE

DATE: December 15, 2008

TO: All Prescription Drug Plan and Medicare Advantage Plan Sponsors

FROM: Cynthia G. Tudor, Ph.D., Director, Medicare Drug Benefit and C & D Data Group

SUBJECT: Parts C & D Reporting Requirements Data Analysis Project

Since 2006, CMS has collected Part D Reporting Requirement data and has conducted all associated data analysis and sponsor communication in-house. In order to increase the efficiency of this process, CMS recently awarded a contract to Acumen, LLC for the purpose of automating the quality and validation assessments of reporting requirement data. Data from HMPS will be fed into Acumen's "Reporting Analysis Tool" which will produce reports of sponsors not meeting deadlines and those sponsors who are flagged as outliers. These analysis reports will be used to generate emails to sponsors asking for completion, correction or confirmation of their data. When the Part C Reporting Requirements are in effect beginning in 2009, Acumen will conduct these assessments of the Part C data as well through the "Reporting Analysis Tool".

To facilitate communication with sponsors, Acumen has established the Part C& D Reporting Requirements Analysis website as a location for plans to monitor the submission and error resolution of submitted Part C & D Reporting data. Authorized users at the plan will be able to download detailed and summary reports for their respective contracts, as well as participate in discussions with CMS regarding error resolution via contract-specific discussion boards. We expect this website to replace our current email process for communicating missing and outlier data. However, because of the timing of the contract award, CMS will maintain its current process to communicate with Part D sponsors regarding the Part D Reporting Requirement measures that were due on November 30, 2008. Sponsors should expect to receive all subsequent communication on reporting requirements validation assessments via the Part C& D Reporting Requirements Analysis website beginning with reporting requirements due during the next reporting period.

The purpose of this memo is to solicit all Part C and D sponsors to establish appropriate points of contact for the Part C& D Reporting Requirements Analysis website. Beyond the Compliance Officer who will automatically be granted access to this website, the most appropriate users are staff who will be directly involved in the process of creating and submitting Part C and D reporting requirement data. Part D organizations that already have access to Acumen's other plan communication websites should still respond to the request in this memo to designate the

appropriate staff for this particular project. The attachment to this memo explains how to establish access for new users. The due date for this request is December 30, 2008.

If you have any questions, please contact Acumen at CPC@AcumenLLC.com or by phone at (650) 558-8006.

ATTACHMENT A: General Instructions

Acumen has created a website to facilitate the Part C & D Reporting Requirement data quality assessment and validation process. Part D sponsors will use this site to upload, download, and communicate with Acumen and CMS. This secure website will be accessible only to authorized participants, with each sponsor utilizing a space on this site that is separately secured from all other participants. The website will facilitate the communication, tracking, and resolution of contract-specific issues through use of discussion boards and reports exclusive to the Part D sponsor's designated representatives. The link to the site will be distributed to authorized users via a welcome package to be delivered just prior to the reporting period in which Acumen will take over the analysis and plan communication.

For Acumen to grant access to the Part C& D Reporting Requirements Analysis Website, **the Medicare Compliance Officer of participating Part C & D sponsors must authorize users through the User Security Website at https://PartD.ProgramInfo.US/User_Security.**

- For security purposes, contracts are limited to **five** authorized users.
 - All users will have access to all features of the Part C& D Reporting Requirements Analysis Website, including viewing summary and detailed reports, and viewing and replying to discussion boards. In addition, all users will receive email notifications regarding report availability.
 - To help you plan for this effort and to identify the appropriate users, the information on the next page provides an overview of the process you should expect.
- In order for new users to gain access to the Part C& D Reporting Requirements Analysis Website, **your contract's Medicare Compliance Officer must complete the following steps:**
 1. Acumen, LLC currently manages multiple websites for Medicare Part D contracts, including the Part C& D Reporting Requirements Analysis Website. In accordance with Federal Information Security Management Act (FISMA) regulations, only the Medicare Compliance Officer is authorized to give access to these websites for each contract. To streamline this process, Acumen has developed the User Security Website – a web tool that allows Medicare Compliance Officers to manage their users on the Part D websites.
 - **If you are a Part D sponsor that was active in 2008**, your current Medicare Compliance Officer should already have access to the User Security Website through existing work with Acumen.
 - **If you are a new Part D sponsor for 2009**, you should have recently received or will soon be receiving a welcome email and a letter with login credentials via USPS.
 - **If you are a Part C-only sponsor**, you should have recently received or will soon be receiving a welcome email and a letter with login credentials via USPS.
 2. To authorize users for the Part C& D Reporting Requirements Analysis Website, the Medicare Compliance Officer, must log onto the User Security Website to:
 - Submit an Available User Request Form for each proposed user.
 - Authorize access permissions for each user.

- To ensure timely access to the Part C& D Reporting Requirements Analysis Website, Medicare Compliance Officers must complete the user authorization process as soon as possible but no later than December 30, 2008.
3. Acumen will send authorized Part C& D Reporting Requirements Analysis Website users:
- An email with the website user guide
 - A letter with login credentials via USPS