

# Medicare Marketing Guidelines Updates



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**September 10, 2015**

# **Top 5 Changes Medicare Marketing Guidelines**

- # 1: Documents to Post by September 30 (100.1)
- # 2: Hardcopy Directory Mailing (60.4)
- # 3: Updating Online Directory (100.4)
- # 4: Updated Benefit Disclaimers (50.2)
- # 5: New Provider/Pharmacy Network Disclaimers (50.15)

# # 1: Documents to Post by September 30 (100.1)

- **100.1 – General Website Requirements**
  - Plans must post the following by September 30:
    - ✓ ANOC/EOC
    - ✓ Provider and/or Pharmacy Directory
    - ✓ Formulary and Utilization Management Documents
    - ✓ Multi-Language Insert

# # 1: Documents to Post by September 30 (100.1) – Cont.

## *What if I'm a...*

- ★ New Plan:
  - Post applicable documents between October 1 and December 31. (We know you don't have an ANOC!)
- ★ D-SNP or MMP that separates ANOC and EOC:
  - Post ANOC by September 30 and EOC by December 31.
- ★ Section 1876 cost plan that does not offer Part D:
  - Post ANOC/EOC by December 1.

# Most Common Question



*Question: Do you really mean this?*



## # 2: Hardcopy Directory Mailing (60.4)

***Plans Told Us, “The Times They are a-Changin.”***

- Plans may provide a notice directing enrollees to an electronic Provider/Pharmacy Directory in lieu of a hardcopy Directory.



# Most Common Question



***Question: When we provide a hardcopy of the Provider/Pharmacy Directory, does it have to be current and up-to-date?***

Answer: Yes. If information has changed since the most recent printing of the hardcopy Directory, plans may provide the updated information as an addendum to the Directory.



# # 3: Updating Online Directory (100.4)

- **New Online Provider/Pharmacy Directory Requirements**

- ✓ Online Provider Directory must contain a notation indicating availability to new patients.
- ✓ Providers should be contacted on a monthly basis to update information.
- ✓ Plans should update Online Provider Directory any time they become aware of changes.



# Most Common Question



***Question: What constitutes monthly contact with providers?***

**Answer: Our upcoming panelists will share their best practices!**



## # 4: Updated Benefit Disclaimers (50.2)

- **50.2 – Disclaimers When Benefits Are Mentioned**
  - **Changed to** “[Benefits, premiums and/or co-payments/co-insurance] may change on January 1 of each year.”

## **# 5: New Provider/Pharmacy Network Disclaimers (50.15)**

- **50.15 – Pharmacy/Provider Directory and Formulary Disclaimers**
  - New disclaimer states that formulary, pharmacy network and provider network may change at any time.
  - New disclaimer for Part D Sponsors with limited access to preferred cost sharing pharmacies.

# Help!



- Medicare Marketing Guidelines are available at:  
<https://www.cms.gov/Medicare/Health-Plans/ManagedCareMarketing/FinalPartCMarketingGuidelines.html>.
- HPMS Memos:
  - July 2, 2015, “Release of the 2016 Medicare Marketing Guidelines”
  - August 13, 2015, “Clarification of CY2016 Medicare Marketing Guidelines”

# More Help!



- Contact:
  - Your Account Manager
  - Your Marketing Reviewer
  - [Marketing@cms.hhs.gov](mailto:Marketing@cms.hhs.gov)  
(Marketing@cms.hhs.gov)