

Medication Therapy Management (MTM) Panel

Emily Greenspon

**Division of Analysis, Policy, and Strategy,
Medicare Parts C & D Oversight and
Enforcement Group, Center for Medicare,
CMS**

May 11, 2017



For Official Federal Government Use Only

This pre-decisional, privileged, and confidential information is for internal government use only, and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law

Medication Therapy Management (MTM) Panel

Theodore S. Regalia

Ministry HealthCare

May 11, 2017



For Official Federal Government Use Only

This pre-decisional, privileged, and confidential information is for internal government use only, and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law

Polling Question #1

Which cat is my cat, Bob?

1



2



3



4



Polling Question #3

What service model do you use for MTM?

1. Fully Delegated to Pharmacy Benefit Manager (PBM) — who may use a vendor
2. Direct Contract with MTM Vendor
3. In-House
4. Hybrid of any of the above

Pilot MTM Audit at Network Health

- Performed Remotely – Video Conference/Screen Sharing
- PBM and MTM vendor participated with Plan
- Audit lasted three days
- Four universe pulls [Enrollment, Disenrollment, Comprehensive Medication Review (CMR), Targeted Medication Review (TMR)]
- 50 members reviewed

Discussions

- Does a 90-day prescription claim count as three fills or one fill?
- How to identify long-term care and ensure inclusion in MTM
- How to assess disease state? Single drug, groups of drugs, drugs that cross categories, two fills minimum?
- Why aren't members qualifying?

Discussions (cont.)

- Survey reasons for Opting-Out
- How is qualification handled in transition to new year?
- How is medication reconciliation performed?
- How is cognitive impairment determined and protected health information (PHI) rules satisfied?

Surprises

- Our 120-day look back did NOT identify and include members who probably should qualify for MTM
- Auditors requested recorded phone calls, returned mail scans, and additional retrievable data
- Few referrals were made to plan for clinical follow-up
- Inadequate communication with PBM in cases where PBM could not reach our members who qualified
- Minimal oversight by Plan of this delegated function

Resultant Changes Made by Plan

- Increased look back from 120 to 150 days
- Biweekly report from PBM on incorrect address/phone number listed on our members
- Increased Plan oversight, review of MTM (audits)
- In-House-Hybrid MTM program
 - Stratify neediest members and perform CMR in-house
 - Medical, Quality, and Case Management included
 - Pharmaco-economic component
 - Record calls
 - Perform CMRs in SNF and in clinic where approved

Questions

SCAN Health Plan

CMS MTMP Pilot Audit Experience

Crystal C. Chang
Kempton Presley

SCAN Health Plan

May 11, 2017



For Official Federal Government Use Only

This pre-decisional, privileged, and confidential information is for internal government use only, and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law

About SCAN Health Plan



- MAPD plan
- Special Needs Plans
 - ✓ Institutional
 - ✓ Dual
 - ✓ Chronic care

186,000 members



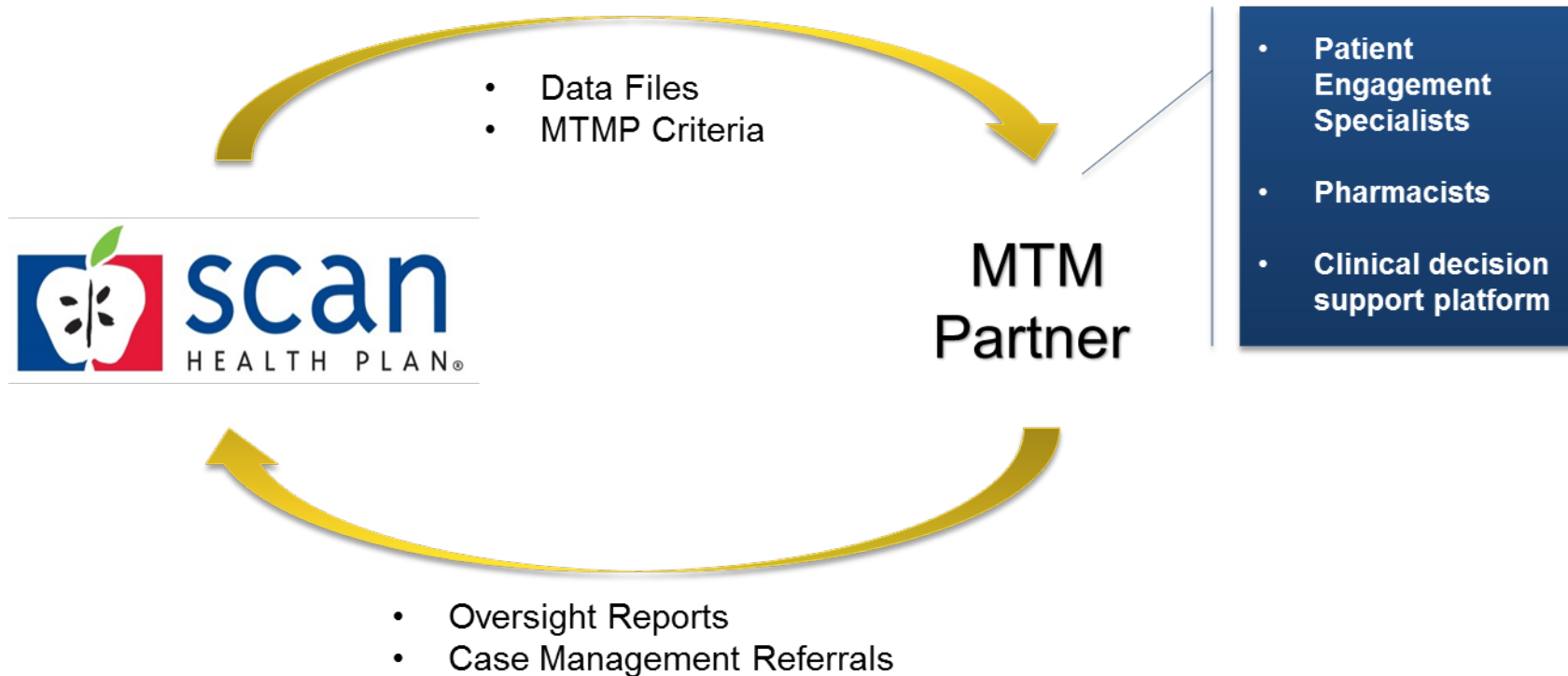
**Mission-driven
not-for-profit
40 years**

**Network model:
60+
Medical Groups**



*4-Star rating applies to all plans offered by SCAN Health Plan except SCAN Healthy At Home (HMO SNP). Medicare evaluates plans based on a 5-Star rating system. Star Ratings are calculated each year and may change from one year to the next.

MTMP Overview



Poll Question #1

What data sources are used to identify chronic conditions for potential MTM eligible members?

- a. Medical claims only
- b. Rx-inferred diagnoses only
- c. Medical and Rx Claims
- d. HCC Risk Scores
- e. Other

Poll Question #2

What is the percentage of member-requested opt outs in your MTMP?

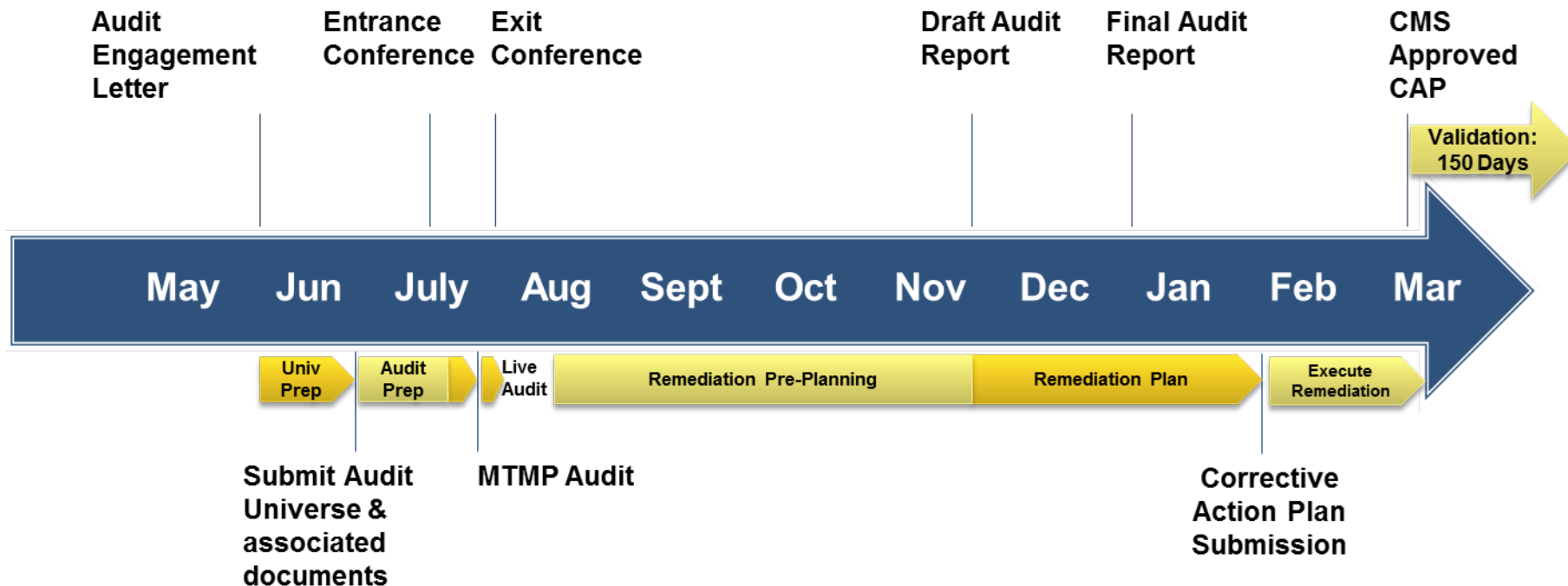
- a. 0-1%
- b. 2-5%
- c. 6-10%
- d. 11-15%
- e. Greater than 15%
- f. Not sure

Poll Question #3

How do you engage LTC members in your MTMP?

- a. Contract with LTC facilities/pharmacies
- b. Leverage CMS LTC Institutionalized Reports
- c. Use internal eligibility files
- d. All of the above
- e. None of the above

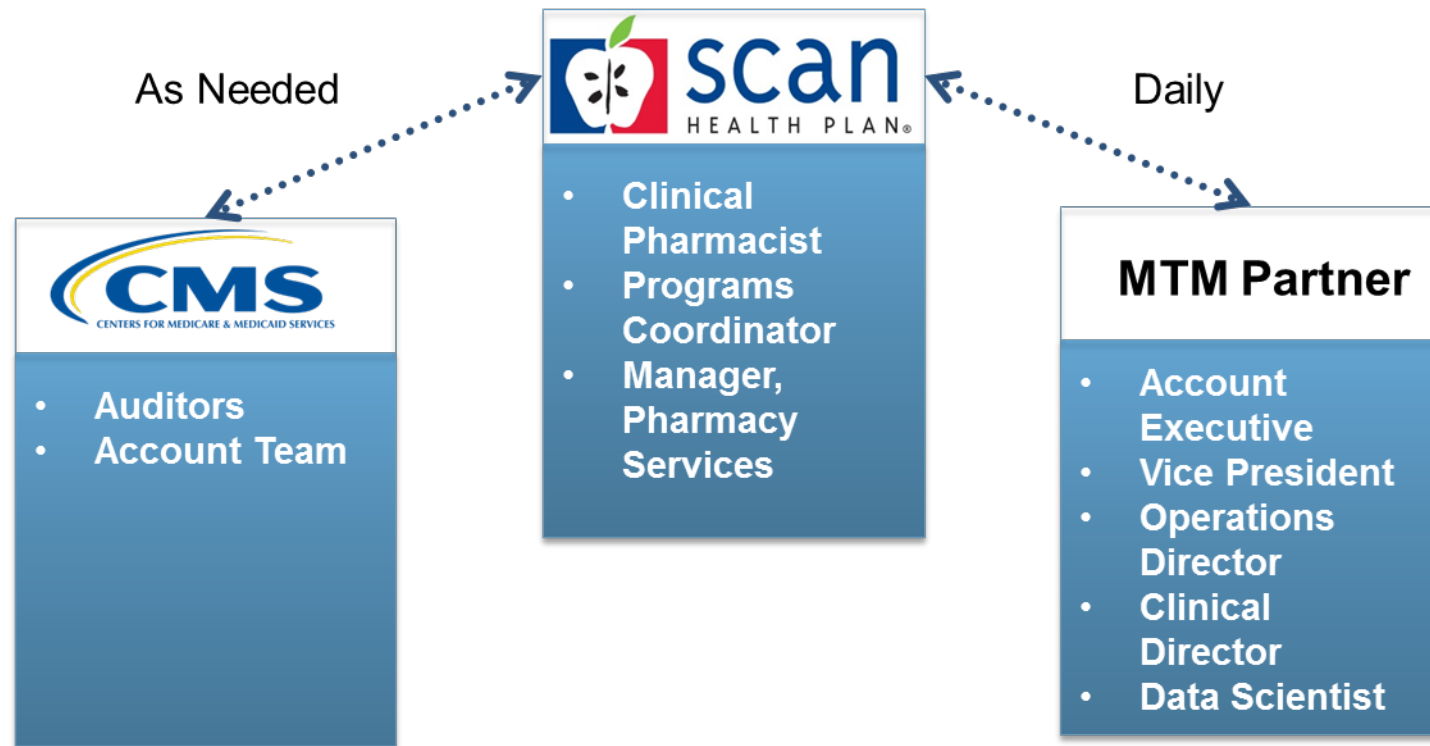
2016 CMS Audit Timeline



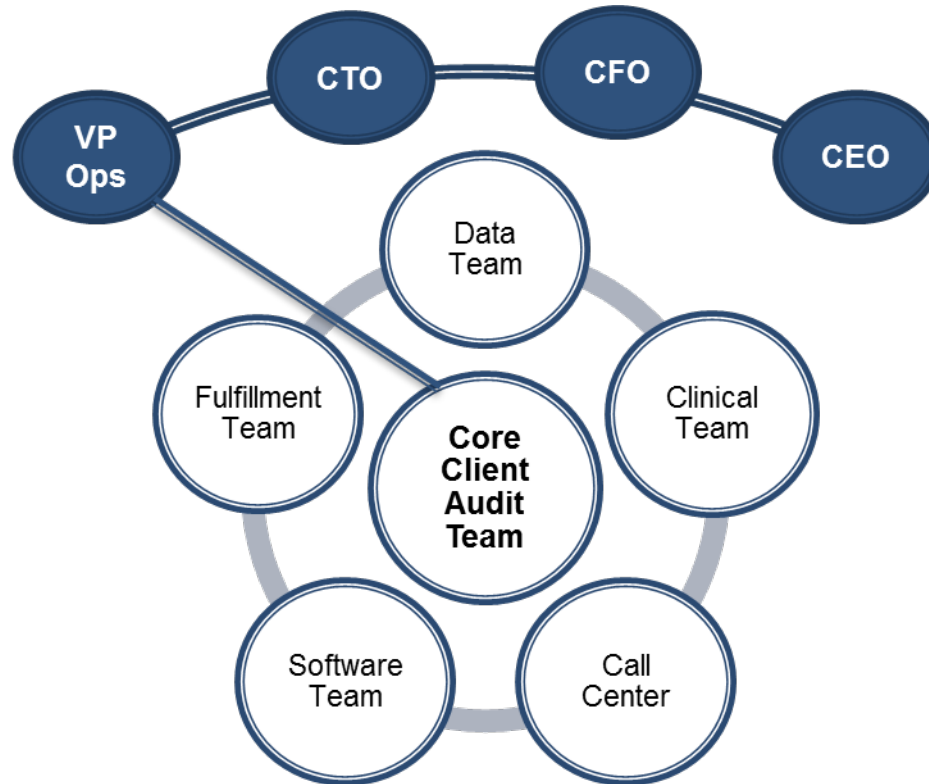
Audit Universe

Challenge	Tips/Actions
Short turnaround to provide audit universe with new data elements not coded or captured	<ul style="list-style-type: none">• Frequent and open lines of communication with CMS and MTM partner• MTM partner all hands on deck to support programming needs• Year round audit-readiness

Communication is Key



MTM Partner Leadership Support



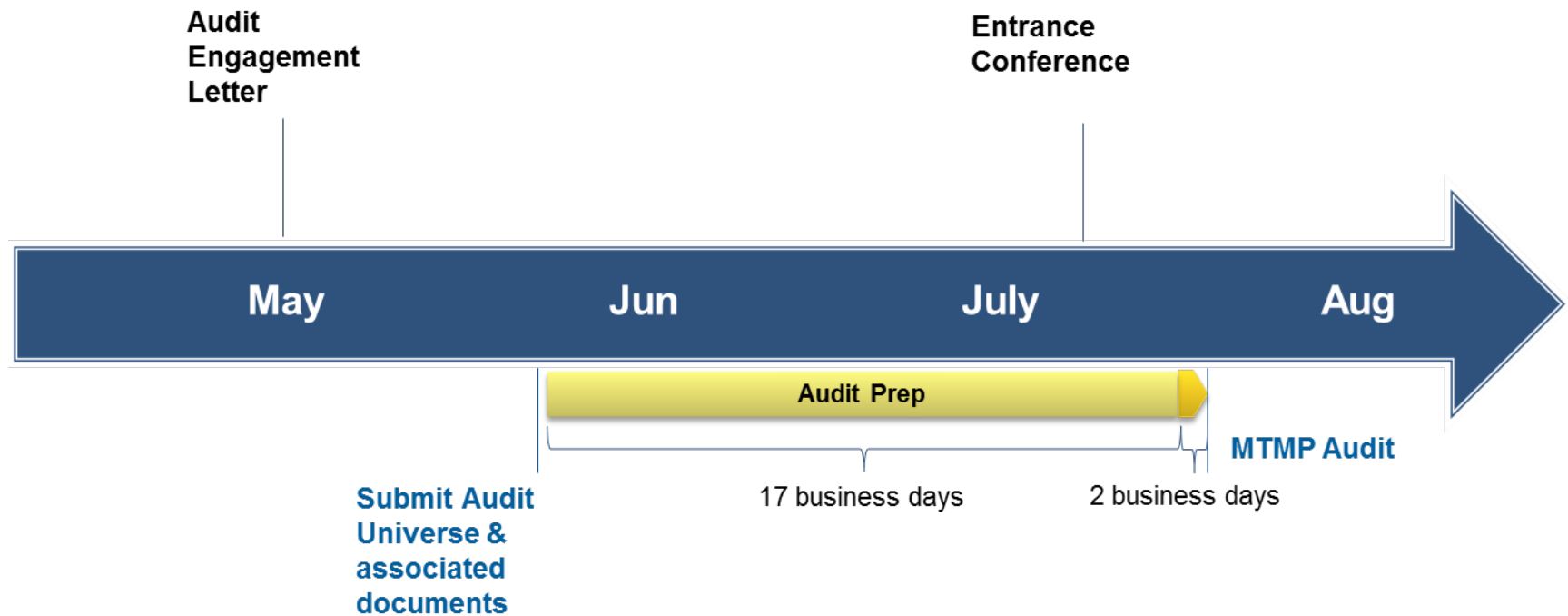
Executive Team

**Organizational
Endorsement &
Communication**

Audit Readiness Year Round



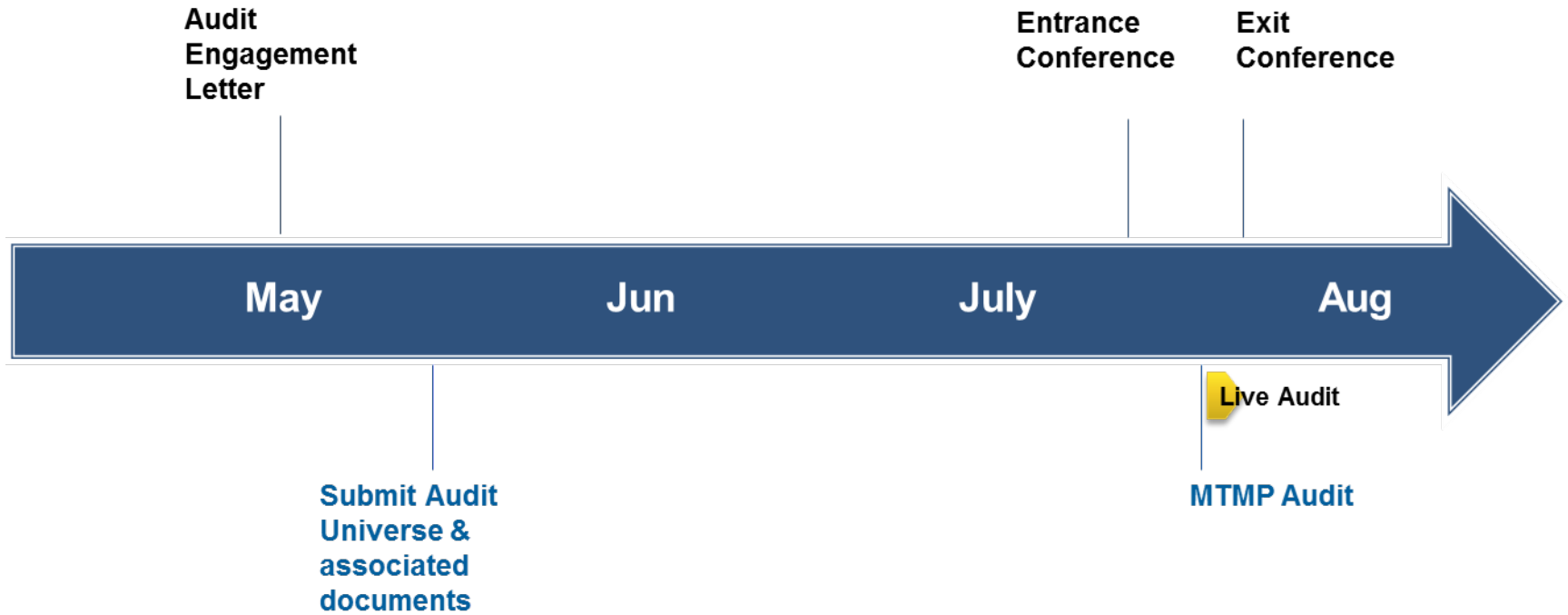
Preparing for the Audit



Preparing for Live Audit

Challenge	Tips/Actions
Need to navigate through anticipated documentation/live systems	<ul style="list-style-type: none"> • Prepare the case • Rehearse navigating
Heavy reliance on producing data to support reporting	<ul style="list-style-type: none"> • Anticipate what data is needed; need data analyst
Expertise from others may be needed to produce supporting information	<ul style="list-style-type: none"> • Enlist help of others
Short turnaround to provide documentation for sample selection	<ul style="list-style-type: none"> • Open lines of communication with CMS and Sponsor's MTM partner • Sponsor's MTM partner all hands on deck to support programming needs within short turnaround

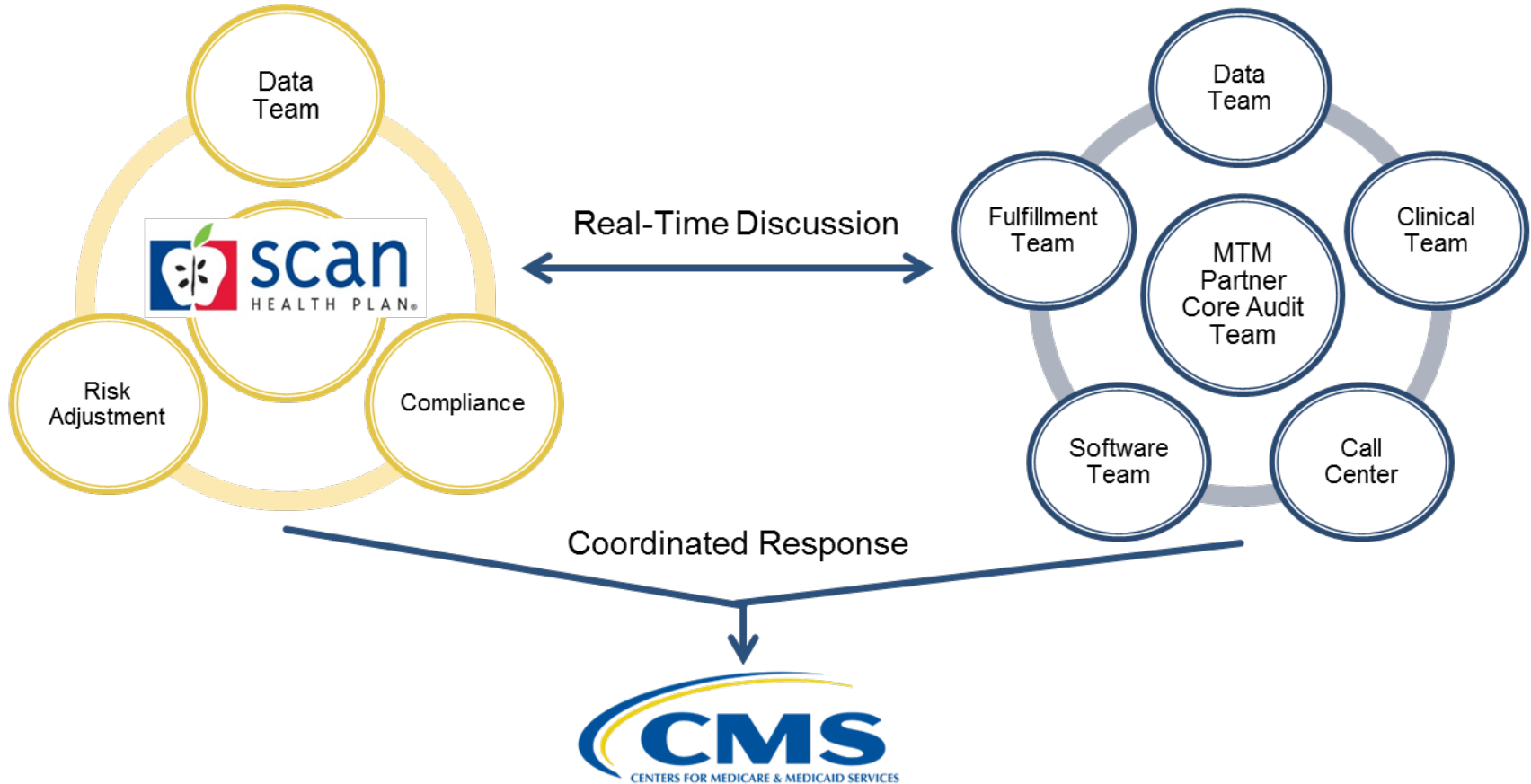
Live Audit



Live Audit (cont.)

Challenge	Tips/Actions
Potential reliance on other departments to produce supporting data	<ul style="list-style-type: none"> • Enlist help of anticipated departments to participate in audit on standby
Ensure accurate responses are provided to CMS	<ul style="list-style-type: none"> • Effectively coordinate with MTM partner on responses
Producing all deliverables in real-time	<ul style="list-style-type: none"> • MTM partner all hands on deck to support programming needs within short turnaround • Designated “driver” through live system • Ensure access to live systems

Live Audit (cont.)



Poll Question

What areas do you foresee to be the biggest challenge in time of an audit?

- a. Clinical team bandwidth
- b. Access to primary source data
- c. Data analytics
- d. Visibility/coordination with other departments
- e. Other
- f. I'm perfect, please audit me

Lessons Learned

- Great opportunity to evaluate our MTM Program with a microscopic lens
 - Leverage Rx-inferred diagnosis
 - Feedback loop with MTM partner to obtain updated member contact information
- Well-established working relationship with MTM partner facilitated easy audit coordination and preparation
- Reliance on other departments
- Comprehensively capture MTM data points beyond annual reporting to support “entire picture” of MTMP