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DATE: October 5, 2016

TO: All Part D Plans

FROM: Amy Larrick Chavez-Valdez
Director, Medicare Drug Benefit and C&D Data Group

SUBJECT: Preparation for 2017 Contract Year Coordination of Benefits Activities

The purpose of this memo is to assist Medicare Part D plan sponsors (Sponsors) with preparing to meet Part D Coordination of Benefits (COB) requirements for the 2017 Contract Year. The Centers for Medicare & Medicaid Services (CMS) encourages Sponsors to begin these preparations as early as possible.

Part D Sponsor Performance Reports

Last year, CMS instituted an email distribution process for performance reports relating to Supplemental Information Requests (Nx) and Financial Information Reporting (FIR)¹. Access to these performance reports needs to be appropriately controlled as they contain beneficiary identifying information, and only employees of the plan Sponsor are able to receive them. The report distribution list is administered and maintained through the Part D Transaction Facilitator (Facilitator) website.

This memo serves as a notification to Sponsors that the Facilitator has developed a new form to collect the 2017 distribution lists. Sponsors can access the form, and submit their lists beginning October 1, 2016 through the Facilitator's portal at <http://medifacd.relayhealth.com/fir/setting-up-points-of-contact-for-a-contract-id>. For the 2017 year the Facilitator will implement a full file replacement process. In other words, each Sponsor's initial list submission and all subsequent updates need to include all plan employees who will receive each type of report for the upcoming year. Any required updates after the initial submission can be made by either omitting an individual (for those that need to be deleted) or adding an individual (for those that need to be added); however, the file should represent all individuals who should receive reports.

Business Associate Agreements

All Sponsors, including Programs of All Inclusive Care for the Elderly (PACE) organizations, are expected to enter into Business Associate Agreements (BAAs) with the

¹ See HPMS Memo "Change to Distribution of Nx and Automated TrOOP Balance Transfer Performance Reports" 9/23/15

Facilitator in order to perform routine COB-related functions. In order to ensure new BAAs and new contract additions to existing BAAs are in place for the 2017 contract year, Sponsors are expected to submit new BAAs and/or implementation forms to the Transaction Facilitator no later than December 16, 2016.

The BAA template, an implementation form, and instructions for completing and submitting the documentation are available at: <http://medifacd.relayhealth.com/fir/baa>. Sponsors may not modify the approved template unless there is a regulatory/statutory basis for the modification.

Please send any questions about this email to PartD_COB@cms.hhs.gov.