



Overview of the PACE Application Process



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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 2020
- Completing and Submitting PACE Application
- Important Reminders!
- PACE Part D Application
- Request for Additional Information
- Important Dates



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 2020 Initial/SAE PACE application is posted on the CMS webpage at:
<https://www.cms.gov/Medicare/Health-Plans/PACE/Overview.html>



NOIA Submission for Initial PACE Applications

- NOIA form for initial PACE applicants (posted at <https://www.cms.gov/Medicare/Health-Plans/PACE/Overview.html>).
- Active PACE organizations should notify respective Account Manager of plans to submit expansion application!
- Submit NOIA request form to the DMAO portal to obtain a pending contract number.
- See the November 13, 2019 HPMS memo titled, “New Instructions for Requesting Access to the Health Plan Management System” for instructions obtaining CMS User ID.
- Process may take a week.



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.



Key Changes to Application for 2020

- Application modified to align with updated PACE regulations (CMS-4168-F), effective August 2, 2019, which update and modernizes the PACE program.
- Key updates:
 - Codifies current application requirements for both initial and expansion applications.
 - Specifies 45 day and 90-day review clocks as applicable depending on type of application.
 - Deemed approval requirements specific to initial PACE applicants only.
 - Added requirement: Per §460.20(c) (2): if more than 12 months elapse between date of initial submission of application and the entity's response to the CMS request for additional information, the entity must update the application to provide most current information and materials related to the application.



Key Changes to Application for 2020 (Cont.)

- Global change from Quality Assessment and Performance Improvement (QAPI) to quality improvement.
- Waiver requests: A majority of most commonly-requested waivers are allowed per the new rule, so fewer formal waiver requests anticipated. However, depending on unique circumstances there may be a need to request new and different waivers.
- States may now provide either Medicaid capitation rate amounts or the methodology used to calculate the rate amounts.
- Impact on Application:
 - Some attestations no longer applicable and others modified to account for updated regulatory requirements.
 - Minor tweaks to certain document upload requirements for clarification purposes.
 - Some corrections to regulatory citations referenced in certain attestations based on updated regulations.



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.



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) or the methodology for calculating the rates.
- CMS will not review documents provided that are not required as part of the application (e.g., letter templates, forms).
- Existing PACE organizations may not submit an expansion application if one is currently pending.



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!*



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.



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.

PACE Part D Application – Initial PACE Application Only

- Submit PACE Part D application in HPMS
 - The 2020 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

PACE Part D Application – Important Tips

- Enter all Part D subcontractors in the Part D Data Section of Basic Contract management in HPMS.
- 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.

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.
- If you are responding to an RAI and more than a year has passed since your initial submission, you will need to submit new contracts or signed evidence that the contracts are still in effect for the required term.



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.



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://pace.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 depending on type of application.



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, 2020
	2nd quarter	April 1 to April 30, 2020
	3rd quarter	July 1 to July 31, 2020
	4th quarter	October 1 to October 31, 2020
Request HPMS access as a new user	1st quarter	January 1 to January 31, 2020
	2nd quarter	April 1 to April 30, 2020
	3rd quarter	July 1 to July 31, 2020
	4th quarter	October 1 to October 31, 2020
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 27, 2020
	2nd quarter	June 26, 2020
	3rd quarter	September 25, 2020
	4th quarter	December 28, 2020



Resources

- The Notice of Intent to Apply form is available at:
<https://www.cms.gov/Medicare/Health-Plans/PACE/Overview.html>
- For instructions obtaining CMS User ID and password, see the November 13, 2019 HPMS memo titled, “New Instructions for Requesting Access to the Health Plan Management System”
- A paper version of the 2020 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
- Fiscal Soundness policy-related questions may be submitted to:
FinancialReview@cms.hhs.gov
- General application questions may be submitted in the portal at:
<https://pace.lmi.org>
- A list of State websites for additional information on PACE:
<https://www.medicaid.gov/sites/default/files/2019-12/state-website-list.pdf>