

DEPARTMENT OF HEALTH & HUMAN SERVICES  
Centers for Medicare & Medicaid Services  
Center for Beneficiary Choices  
7500 Security Boulevard, Mail Stop C4-23-07  
Baltimore, Maryland 21244-1850



**MEDICARE DRUG & HEALTH PLAN CONTRACT ADMINISTRATION GROUP**

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Date: February 3, 2010

To: Regional Preferred Provider Organizations

From: Danielle R. Moon, J.D., M.P.A.  
Director

Subject: RPPO Network Adequacy Assessment Audit

The purpose of this memo is to advise you that the Centers for Medicare & Medicaid Services (CMS) is conducting an audit of Regional Preferred Provider Organizations' (RPPO's) utilization of "methods other than written agreements" to meet access standards. We are conducting this assessment to support regulatory provisions in 42 CFR 422.114(a) that require Private Fee-For-Service (PFFS) plans to have a network of contracted providers in areas where there are two or more Coordinated Care Plans (CCPs). For purposes of this definition, RPPOs do not count as competition in areas where the RPPO uses alternative means to meet CMS access and availability standards.

CMS must audit RPPOs current networks to determine what areas and provider types RPPOs are using alternative mechanisms instead of contracted providers. Alternative mechanisms include the use of Essential Hospitals, accessing non-contracted providers at in-network cost sharing, and any other CMS approved mechanisms. All network data provided is subject to further audit as CMS determines necessary.

Please complete the attached Health Services Delivery (HSD) tables and attestation. All tables must be completed and electronically submitted in the attached excel format. Do not alter the tables or use a different version of the tables. All documents must be sent via email to Daniella Stanley at [daniella.stanley@cms.hhs.gov](mailto:daniella.stanley@cms.hhs.gov) by February 19, 2010. We thank you for your cooperation.

If you have any questions regarding this memo, please contact Daniella Stanley at (410) 786-3723.

Attachments:  
HSD Tables (Excel Files)  
RPPO HSD Validation Attestation