

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
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CENTER FOR BENEFICIARY CHOICES

TO: All Part D Sponsors

FM: Cynthia Tudor, Acting Director, Medicare Drug Benefit Group

SUBJECT: Due Diligence in Prior Authorization of Part B versus Part D Coverage Deliverables

In late March, CMS issued policy guidance to Part D sponsors regarding simplifying whether a drug should be billed to Part D versus Part B (see Clarification of Plan Due Diligence in Prior Authorization of Part B versus Part D Coverage Determinations, dated March 24, 2006). Since we issued this guidance, we have continued to receive concerns from pharmacists that plans are not implementing this policy. Thus, we are re-issuing our prior guidance and also providing additional information about operationalizing the Part B versus Part D due diligence approach (See the last column of the attached Parts B/D Coverage Summary Table titled “Written Prescription Indicators to Highlight B/D Coverage”).

It is our expectation that Part D sponsors will implement this approach immediately as it will minimize difficulties experienced by pharmacists in filling prescriptions.

We appreciate your continued cooperation in implementing the Medicare Part D benefits. If you have any questions, please contact Gregory Dill at gregory.dill@cms.hhs.gov.