



## **CENTER FOR BENEFICIARY CHOICES**

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**August 29, 2006**

**Memorandum To:** All Part D plans

**Subject:** Changes to Part D Sponsors' Medication Therapy Management Program (MTMP)

**From:** Cynthia Tudor, Ph.D., Director, Medicare Drug Benefit Group

**Subject:** Changes to Part D Sponsors' Medication Therapy Management Program (MTMP)

Part D Sponsors are required to establish a Medication Therapy Management Program (MTMP) designed to ensure that covered Part D drugs are appropriately used to optimize therapeutic outcomes through improved medication use and reduced risk of adverse events. Annually each spring, CMS evaluates and approves Part D Sponsor's MTMP for compliance with the current minimum requirements for the upcoming program year. A CMS-approved MTMP is required for all approved Part D Plan Sponsors except for Private Fee for Service (PFFS) plans which are exempt from MTMP requirements.

Part D Sponsors have flexibility to develop and implement a MTMP that can best meet the needs of their specific patient populations and achieve the best therapeutic outcomes. To promote evolving Medication Therapy Management best practices and to consider the best interests of the Medicare beneficiary, CMS will allow certain mid-year changes to the Part D Sponsors' approved MTMP, if requested.

### **Medication Therapy Management Program (MTMP) Changes**

**Q:** What changes can Part D Sponsors make to their CMS-approved MTMP during the program year OR prior to the start of the upcoming program year?

**A:** Part D Sponsors have flexibility to develop and implement a MTMP that can best meet the needs of their specific patient populations and achieve the best therapeutic outcomes. To promote evolving Medication Therapy Management best practices and to consider the best interests of the Medicare beneficiary, CMS will allow certain changes to Part D Sponsors' MTMP, if requested. Part D Sponsors may have experiences during the current contract year that identify the need for changes to the current program year MTMP or to the upcoming contract year program. All proposed Medication Therapy Management Program changes must be submitted to CMS for review and approval prior to the implementation of requested changes.

We have a 4 part policy regarding MTMP changes during the program year OR prior to the start of the upcoming program year.

1. Part D Sponsors may make *positive* changes to the plan-designed eligibility criteria for multiple chronic diseases, multiple covered Part D drugs, or analytical procedures used to determine if a beneficiary is likely to incur annual costs in excess of a predetermined level as specified by the Secretary (\$4,000 in CY 2007). These changes would make the eligibility more inclusive and could increase the number of beneficiaries eligible to receive Part D MTM services. Positive changes may include:
  - a. Decreasing the minimum number of multiple chronic diseases.
  - b. Expanding the list of specific chronic diseases that apply
  - c. Decreasing the minimum number of multiple covered Part D drugs.
  - d. Expanding the list of specific covered Part D drugs, or types of drugs, that apply
2. Part D Sponsors may make program enhancements or maintenance changes that include changes to:
  - a. Method of beneficiary enrollment/disenrollment or identification to increase or promote ease of beneficiary participation.
  - b. Expand the levels of intervention or service provided to participating targeted beneficiaries.
  - c. Methods of documenting and measuring outcomes.

3. Part D Sponsors may make changes to the following:
  - a. The provider of MTM services,
  - b. Any fee schedules established for pharmacists and other MTM providers if using outside personnel. CMS will request that Part D Sponsors disclose the newly established fees for outside personnel.
4. Part D Sponsors may not make any negative changes to their MTMP. While the following list is not exhaustive, potentially negative changes include changes that:
  - a. Promote discriminatory or exclusionary practices.
  - b. Decrease the number of enrollees eligible for MTM Services
  - c. Lower quality or robustness of MTM services

**Q:** How should Part D Sponsors submit a request to make a change to their MTMP?

**A:** Annually each spring, CMS evaluates and approves Part D Sponsor's MTMP for compliance with the current minimum requirements for the upcoming program year. A CMS-approved MTMP is a required for all approved Part D Plan Sponsors except for PFFS plans which are exempt from medication therapy management program requirements. Once approved by CMS, limited changes to the Part D Sponsors' MTMP may be allowed in accordance with CMS policy. All proposed Medication Therapy Management Program changes must be submitted to CMS for review and approval prior to the implementation of requested changes in the manner described below. Part D Sponsors must attest that any approved MTM marketing materials are not impacted by the proposed change or, alternatively, will be submitted and approved by CMS as necessary prior to implementation of the change.

#### 1. Medication Therapy Management Program (MTMP) Changes During Program Year

MTMP requests for changes during the program year may be submitted to CMS during the first 10 days of the last month of the quarter, starting with the second quarter. Specifically, requests may be made from March 1-March 10, June 1-June 10, and September 1-September 10. Requests should be submitted electronically to [partd\\_mtm@cms.hhs.gov](mailto:partd_mtm@cms.hhs.gov). The MTMP change request form should be completed and sent along with the entire (revised) MTMP in the same format as the program submitted for initial CMS approval. Beginning for contract year 2007, MTMP proposals are submitted using a template. If one MTMP change request applies to multiple contract IDs, one change request form and attached program may be submitted which lists all applicable contract IDs.

Part D Sponsor's will receive an email correspondence regarding the approval of the MTMP change request. Part D plans must not implement such changes until they receive explicit notification of approval from CMS and must not submit any changes to marketing material until receiving explicit and affirmative CMS approval. Depending upon the number of submitted requests, plans should expect a response within 30 days.

#### 2. Medication Therapy Management Program (MTMP) Changes Prior to Program Year

Requests for changes to existing MTMPs that would be effective for an upcoming program year should be submitted to CMS between September 1 and September 10. Requests should be submitted electronically to [partd\\_mtm@cms.hhs.gov](mailto:partd_mtm@cms.hhs.gov). The MTMP change request form should be completed and sent along with the entire (revised) MTMP in the same format as the program submitted for initial CMS approval. Beginning for contract year 2007, MTMP proposals were submitted using a template. If one MTMP change request applies to multiple contract IDs, one change request form and attached program may be submitted which lists all applicable contract IDs.

The Part D Sponsor will receive an email correspondence regarding the approval of the MTMP change request.

**Q:** Can Part D Sponsors adjust their bid based on changes to their CMS-approved MTMP?

**A:** No. A CMS-approved MTMP is required for all approved Part D Plan Sponsors, other than Part D sponsors whose only plans are PFFS plans. CMS considers MTMP to be an administrative cost that is included in each plan's bid and premium. Part D Sponsors may not adjust their bids based on requested changes to their CMS-approved MTMP.

**Q:** Where can I find the MTMP Change Request Form?

**A:** The form is attached with this Memo and will be made available on our website at the following location:

[http://www.cms.hhs.gov/PrescriptionDrugCovContra/10\\_RxContracting\\_SpecialGuidance.asp#TopOfPage](http://www.cms.hhs.gov/PrescriptionDrugCovContra/10_RxContracting_SpecialGuidance.asp#TopOfPage) .

## **Medication Therapy Management Program (MTMP) Change Request Form**

- This change request form should be used to communicate Medication Therapy Management Program (MTMP) changes to CMS for review.
- Completed change request form should be emailed to [partd\\_mtm@cms.hhs.gov](mailto:partd_mtm@cms.hhs.gov).
- The entire (revised) MTMP should be submitted for review along with the change request form. The MTMP should be submitted in the same format as the program submitted for initial CMS approval. Beginning for program year 2007 submissions, MTMP proposals were submitted using a template.
- Part D Sponsors must attest that any approved MTM marketing materials are not impacted by the proposed change or such marketing materials will be submitted and approved by CMS as necessary prior to implementation of the change.

**Contract ID(s):**

**Organization Name:**

**MTMP Main Contact Name:**

**MTMP Main Contact Phone Number:**

**MTMP Main Contact Email Address:**

**MTMP Program Year (yyyy):**

**Effective date of MTMP change (mm/dd/yyyy):**

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**Within the appropriate section, provide a brief description and reason for the MTMP change requested:**

Section	Brief description of MTMP change and reason
Eligibility Criteria	
Identification	
Method of enrollment or disenrollment	
Interventions	
Provider of MTM services/ Resources:	
Fees	
Outcomes	
Other	

I attest that the following change(s) either do not impact approved MTM marketing materials or such marketing materials will be submitted and approved by CMS as necessary prior to implementation of the change.

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(Name)

(Title)

(Date)