

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
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**Center for Medicare
Medicare Plan Payment Group**

Date: October 8, 2010

To: All Part D Plan Sponsors

From: Cheri Rice, Acting Director, Medicare Plan Payment Group

Subject: Prescription Drug Event (PDE) Reporting and Websites

Correct payment for the Part D drug benefit and the accuracy of the Part D payment reconciliation is dependent on the Prescription Drug Event (PDE) data submitted by Part D Sponsors. Therefore, the accuracy of the PDE data submitted by Sponsors through the Drug Data Processing System is extremely important to the Centers for Medicare & Medicaid Services (CMS). CMS strongly encourages plans to take steps to improve their PDE submissions. Sponsors should take an active and consistent approach to the resolution of PDE errors that lead to PDE rejections and inaccuracies in plan-reported financial data used in the Part D payment reconciliation process.

This memorandum is to inform Part D Sponsors of the continuation of two PDE reporting initiatives for the 2010 benefit year. These initiatives will be conducted through secure websites maintained by CMS' contractor, Acumen, LLC:

- **PDE Reports Website** – Since the 2007 benefit year, CMS has been providing Prescription Drug Plans and Medicare Advantage Prescription Drug Plans with reports on the quality, timeliness, and accuracy of plans' PDE data and error resolution efforts through the Immediately Actionable PDE (IAP) Errors Reports, released through Acumen's PDE Reports Website. CMS issued guidance on the IAP Errors Reports in an HPMS memorandum released on November 8, 2007 titled "Prescription Drug Event Reports and Website." CMS will begin producing metrics for the 2010 benefit year, as well as continue this effort for the 2009 benefit year. Reports will no longer be produced for the 2008 benefit year.

In addition to the current errors included in these reports, two new errors that CMS considers to be immediately actionable – 648 and 649 – will be included in the 2010 IAP Reports. A complete listing of errors included in the IAP Errors Reports can be found in Acumen's PDE IAP Report Guide.

In June 2010, CMS also began providing Part D Contracts with reports on PDEs rejected due to eligibility errors, a subset of PDE rejects caused by enrollment timing issues. Metrics will be produced for the 2009 and 2010 benefit years.

- **PDE Analysis Website** – In March 2009, CMS launched another PDE reporting initiative to further ensure Part D payment accuracy by resolving data quality issues in advance of payment reconciliation deadlines. Guidance regarding the PDE Analysis website was released as an HPMS memo on March 17, 2009 titled “Prescription Drug Event Analysis Reports Website.” CMS will begin this effort for the 2010 benefit year.

These secure websites will be accessible only to authorized participants, with each Contract utilizing a space on the site that is separately secured from all other participants. Attachment A to this memorandum describes, in greater detail, the steps Part D Contracts must take to gain access to these websites.

These data reporting initiatives should in no way replace the ongoing review that Part D Contracts routinely conduct to ensure the quality of their PDE data. CMS expects Part D Contracts to take action based on these reports and will monitor contracts on the timeliness of their responses to the reports.

Summary

In response to this memorandum, Part D Contracts must perform the following actions to begin receiving the Acumen reports or verify the access of existing users:

Action	Date
New 2010 Contracts: Identify up to five authorized users for both the PDE Reports and PDE Analysis Websites and submit contact information through Acumen’s User Security Website. Instructions are included in Attachment A.	New user requests and current user validation due by 10/29/2010
Contracts continuing from 2009: No action is necessary if your contract has no changes in authorized users or their level of access. Previously authorized users will retain their access to the PDE Reports and PDE Analysis Websites. If necessary, contracts can modify existing users or their access through Acumen’s User Security Website.	
New Contracts and continuing Contracts that authorize new users: Be prepared to receive login credentials to access the websites.	On a rolling-basis, following submission of contact information

CMS appreciates your cooperation in making these data reporting initiatives a success. If you have any questions about this process, please contact Acumen at PDE@AcumenLLC.com.

ATTACHMENT A: Instructions on User Authorization Process

In order for your Contract to gain access to the PDE Reports and PDE Analysis Websites, the Medicare Compliance Officer must authorize the appropriate staff through Acumen's User Security Website: https://PartD.ProgramInfo.us/User_Security.

- **If your Contract is continuing from 2009**, previously authorized users will retain their access to the websites. You may choose to keep the same users or you may modify users.
- **If your Contract is new in 2010**, you must authorize new users for both websites.

Your Contract's Medicare Compliance Officer should have access to the User Security Website through existing work with Acumen.

To authorize users for the two websites, the Medicare Compliance Officer must log onto the User Security Website to:

1. Submit an Available User Request Form for each user.
2. Authorize access permissions for each user.

To ensure timely access to the website, you must complete the user authorization process as soon as possible, but no later than **October 29, 2010**.

Following the user authorization process, Acumen will send authorized website users:

1. An email with instructions on logging into and navigating the websites.
2. A letter with login credentials via USPS.

For security purposes, contracts are limited to **five** authorized users. All users can log on and navigate the website and receive email notifications regarding report release. However, access to the PDE Reports Website can vary according to three possible access levels for each user:

1. *Site Access Only - No Confidential Reports* – User can log on and navigate the website, but cannot download reports.
2. *Summary Report Only* – User can access summary reports with information on PDE submission, rejection, and error resolution statistics.
3. *Summary and Confidential Beneficiary Reports* – User can access confidential beneficiary information in addition to the summary report.

You may choose to authorize representatives that are currently users on other Acumen websites. However, you must complete the user authorization process again specifically for the PDE Reports and PDE Analysis Websites.

The most appropriate users for this website are staff who are either directly involved in the process of PDE data submission and resolution, or who oversee a third party submitter. If a third party organization is involved in claim submission, you may assign a member of this organization as a user. We recommend, however, you include at least one internal user from your own organization, as one goal of the websites is to help you monitor and resolve third party submission errors.

If you have any questions about the user authorization process, please contact Acumen at CPC@AcumenLLC.com or (650) 558-8006.