

HPMS E-Mail

Date: January 21, 2022

Subject: Release of Updated CY 2022 Part D Baseline OOPC Model

CMS is reissuing an updated version of the Contract Year (CY) 2022 Part D Baseline Out-of-Pocket Cost (OOPC) Model for Medicare Advantage Organizations (MAOs) and Part D sponsors to use in calculating their CY 2022 OOPC values. We have identified an issue in the coding of the Part D model that was released on December 30, 2021 (see Health Plan Management System (HPMS) memorandum titled, “Contract Year 2022 Part C and Part D Baseline Out-of-Pocket Cost Models”). The issue relates to the random assignment of cost sharing for non-formulary (NF) drugs (i.e., cash price, therapeutic alternative, or tiering exception), which impacts the reproducibility of Part D OOPC values when the model is run with different plan lists. Given the timing of this discovery, we are reissuing the CY 2022 Part D Baseline model to include only the enhancement of the Part D cohort (random 0.1% sample of all Part D enrollees). The values produced from the re-issued Part C and Part D OOPC models will be used in CMS’ review of CY 2023 bids, to include PDP Meaningful Difference and MA Total Beneficiary Cost (TBC) evaluations. The additional enhancement that randomly assigns cost sharing for NF drugs may be added in future releases, but it will not be included in the CY 2023 Part D Bid Review OOPC Model released in April 2022 and it will not be used in the evaluation of CY 2023 plans.

The reissued CY 2022 Part C and Part D Baseline OOPC Models may be accessed at:

<https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovGenIn/OOPCResources>.

For convenience, CMS has generated updated CY 2022 Part C and Part D Baseline OOPC Model values for organizations and posted these values in HPMS. The previously posted 2022 OOPC values have been pulled from HPMS. MAO OOPC values can be viewed in HPMS under: **Quality and Performance > Performance Metrics > Costs > Part C Out-of-Pocket Costs**. PDP OOPC values can be viewed in HPMS under: **Quality and Performance > Performance Metrics > Costs > Part D Out-of-Pocket Costs**. Please note that previous versions of the OOPC and TBC data will continue to be accessible in HPMS.

For technical and policy related questions the following resources are available:

- For Part C policy related questions, such as TBC, please contact <https://mabenefitsmailbox.lmi.org>
- For Part D policy related questions about meaningful difference, please submit an email to partdbenefits@cms.hhs.gov
- For technical questions about the Bid Pricing Tool, please submit an email to actuarial-bids@cms.hhs.gov
- For questions about the MPF, please submit an email to mpf@cms.hhs.gov
- For technical questions about the 2022 Baseline OOPC Model, please submit an email to OOPC@cms.hhs.gov