

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
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Baltimore, Maryland 21244-1850



CENTER FOR DRUG AND HEALTH PLAN CHOICE

Date: July 28, 2009

To: All Part D Plan Sponsors

From: Thomas Hutchinson
Director, Medicare Plan Payment Group

Subject: Distribution of 2009 Immediately Actionable Prescription Drug
Event Error and Prescription Drug Event Analysis Reports

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 plans. Therefore, the accuracy of the PDE data submitted by plans 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. Plans 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 2009 benefit year. These initiatives will be conducted through two 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 Report released through the PDE Reports Website. CMS issued guidance on the IAP Errors Report in an HPMS memorandum released on November 8, 2007 titled "Prescription Drug Event Reports and Website." CMS will continue this effort for the 2008 benefit year, as well as begin producing metrics for the 2009 benefit year. Reports are no longer being produced for the 2007 benefit year.
- **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 report was released as an HPMS memo on March 17, 2009 titled

“Prescription Drug Event Analysis Reports Website.” CMS will begin this effort for the 2009 benefit year. This process will no longer continue for the 2008 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. The attachment to this memo describes, in greater detail, the steps Part D contracts must take to gain access to the website.

These data reporting initiatives should in no way replace the ongoing review that Part D sponsors routinely conduct to ensure the quality of their PDE data. CMS expects Part D sponsors 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 2009 Contracts: Identify up to five authorized users for both PDE reports websites and submit contact information through the Acumen User Security Website – instructions are included in the Attachment.	New user requests and current user validation due by 8/14/09
Contracts Continuing from 2008: 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. If necessary, plans can modify existing users or their access to the websites through the Acumen User Security Website.	
New Contracts and Continuing Contracts that authorize new users: Be prepared to receive login credentials to access the websites	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

Instructions on User Authorization Process

In order for your contract to gain access to the secure websites, the Medicare Compliance Officer must authorize appropriate staff through our User Security website (https://PartD.ProgramInfo.us/User_Security).

- **If your contract is continuing from 2008**, previously authorized users retain their access. You may choose to use the same users or you may modify your users.
- **If your contract is new in 2009**, you must authorize new users for both websites.

Your current 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 **July 31, 2009**.

Acumen will send authorized website users:

1. An email with instructions on logging into and navigating the website.
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, as well as receive email notifications regarding report release. However, access to the reports can vary according to three possible access levels for each user:

1. *Site Access Only - No 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 these 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 website is to help you monitor and resolve third party submission errors.

If you have any questions, please contact Acumen at CPC@acumenllc.com or (650) 558-8006.