

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland



CENTER FOR MEDICARE

February 25, 2025

Warning Letter

Contract ID: H3917

Parent Organization Name: UPMC Health System

Legal Entity Name: PITTSBURGH CARE PARTNERSHIP, INC.

PATRICIA STERN
Medicare Compliance Officer
SUITE # 700
2400 ARDMORE BOULEVARD
PITTSBURGH, PA 15221

VIA EMAIL: sternpa@upmc.edu

**RE: WARNING LETTER-FAILURE TO SUBMIT OVERUTILIZATION MONITORING
SYSTEM RESPONSE FORM BY DEADLINE**

Dear PATRICIA STERN:

The Centers for Medicare & Medicaid Services (CMS) is issuing this warning letter to PITTSBURGH CARE PARTNERSHIP, INC., which operates Medicare Part D Contract ID H3917, for failing to provide a response to CMS through the Overutilization Monitoring System (OMS) within 30 days of receiving a report about a potential at-risk beneficiary (PARB). This compliance notice is raised to a warning letter because CMS previously issued a notice of non-compliance to your organization during 2024 for its failure to submit an OMS response form (ORF) by the quarterly deadline.

Since January 2019, CMS has provided Part D contracts that operate a drug management program (DMP) with quarterly OMS reports of PARBs enrolled in that plan who meet the minimum OMS criteria [1]. These contracts receive a quarterly email notification announcing that their report package is available for download through the OMS on the Patient Safety Analysis Web Portal. As required in 42 CFR § 423.153(f)(15), sponsors must provide information to CMS within 30 days of receiving a report about a PARB from CMS. Sponsors must respond for each PARB identified by OMS using the ORF included in the downloadable Detail Overutilization Monitoring Report Package [2].

CMS is issuing this compliance notice to your organization because it failed to submit an ORF response by the below deadline(s):

October 2024 (due 11/29/2024)

Please be aware that this letter will be included in the record of your organization's past Medicare contract performance, which CMS will consider as part of our review of any application for new or expanded Medicare contracts your organization may submit. CMS deems this instance of non-compliance a Part D issue. CMS notes that we are issuing this compliance notice based exclusively on information that we obtained from sources other than the sponsor's own self-disclosure.

In the future, please ensure that your organization submits the ORF within CMS' specified timeframes. For questions regarding OMS reporting and submission, please contact the Overutilization Monitoring System mailbox at PartD_OM@cms.hhs.gov. If you have questions related to the compliance implications of this notice, please contact Christine Hill at Christine.Hill@cms.hhs.gov and copy your account manager.

Sincerely,



Linda Anders, Division Director
Division of Benefit Purchasing and Monitoring
Medicare Drug Benefit and C&D Data Group

CC via email:

Sarah Kamangu, CMS
Arianne Spaccarelli, CMS
Christine Hill, CMS
PartD_OM@cms.hhs.gov

[1] The OMS criteria can be found in the CY 2019 Final Rule at 16452 (<https://www.gpo.gov/fdsys/pkg/FR-2018-04-16/pdf/2018-07179.pdf>).

[2] Technical guidance, including the ORF template, can be found on the CMS Part D Overutilization website at: (<https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovContra/RxUtilization.html>)