DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850

CENTER FOR DRUG AND HEALTH PLAN CHOICE

Date: December 23, 2009

To: All Medicare Advantage Organizations and Part D Sponsors (including PACE Organizations)

From: Cynthia G. Tudor, Ph.D., Director, Medicare Drug Benefit and C & D Data Group

Re: Implementation Changes in the Medicare Part C and Part D Reporting Requirements and Data Validation

In a memorandum dated November 23, 2009, the Centers for Medicare & Medicaid Services (CMS) indicated that information will be made available to you in the near future on implementation changes associated with the CY2010 Medicare Part C and Part D data reporting and data validation initiative. After careful review of the reporting requirements and CMS' continued data needs, CMS made a number of changes in the reporting requirements and data validation. These adjustments reduce burden while maintaining the integrity of the CMS data collection, plan reporting, and plan validation processes so that needed data for monitoring and public reporting are timely, reliable, valid, and comparable among organizations.

Specifically, the following changes will be effective January 1, 2010:

Changes to CY2010 Part C Reporting Requirements:

1) Reporting of the Agent Compensation and Agent Training and Testing measures will be suspended because data on compensation schedules/ranges are being collected elsewhere.
2) The frequency of reporting of two Part C measures is being changed:
    a. Only annual reporting for Plan Oversight of Agents will be required; the quarterly reporting will be suspended.
    b. Only annual reporting for Employer Group Plan Sponsors will be required; the semi-annual reporting will be suspended.
3) Validation of PFFS Provider Payment Dispute Resolution and Private Fee-For-Service (PFFS) Plan Enrollment Verification Calls will not be required because these data will initially be used for monitoring purposes.

Changes to CY2010 Part D Reporting Requirements:

1) Reporting of five sections will be suspended because these data are being collected elsewhere, mostly through Prescription Drug Event (PDE) data.
    - Vaccines,
    - Generic Drug Utilization,
    - Transition,
    - Drug Benefit Analyses, and
    - Agent Training and Testing.

2) The frequency of reporting of six Part D sections is being changed:
    a. Only annual reporting will be required for the following four sections (the semi-annual reporting of these sections will be suspended):
        - Employer/Union-sponsored Group Health Plan Sponsors,
        - Fraud, Waste and Abuse Compliance Programs,
        - Long Term Care (LTC) Utilization, and
        - Medication Therapy Management Program (MTMP).
    b. Only annual reporting for Plan Oversight of Agents and P & T Committees/ Provision of Part D Functions will be required; the quarterly reporting will be suspended.
3) Validation of eight sections will not be required because these data will initially be used for monitoring purposes.
    - Enrollment,
    - Access to Extended Days Supply,
    - Prompt Payment by Part D Sponsors,
    - Pharmacy Support of Electronic Prescribing,
    - P &T Committees/ Provision of Part D Functions,
    - Pharmaceutical Rebates, Discounts and Other Price Concessions,
    - Licensure & Solvency, and
    - Fraud, Waste and Abuse Compliance Programs.
4) We are excluding PACE organizations from CY2010 Part D Reporting Requirements. This is consistent with Part C Reporting Requirements.

The above changes will be incorporated in the final CY2010 Part D Reporting Requirements document and the Part C and D Reporting Requirement Technical Specifications documents, which will be updated and posted to our website in the next few weeks. The data validation standards will also be updated and provided for comment as part of a Paperwork Reduction Act package early next year.

Thank you for your interest in this important matter. Attached to this memorandum is a chart that further summarizes the Part C and Part D reporting and data validation requirements. Questions on Part C reporting should be e-mailed to Partcplanreporting@cms.hhs.gov. Questions on Part D reporting should be e-mailed to PartD-PlanReporting@cms.hhs.gov.

Reductions in Parts C and D Reporting Requirements and Data Validation

Part C Reporting Requirements

#	Measure	Primary Purpose	Current Frequency	Reduce Frequency?	Retain/ Suspend?	Validate?
1	Benefit Utilization	Monitoring/ Public Reporting	Annual	No	Retain	Yes
2	Procedure Frequency	Monitoring/ Public Reporting	Annual	No	Retain	Yes
3	Serious Reportable Adverse Events	Public Reporting	Annual	No	Retain	Yes
4	Provider Network Adequacy	Monitoring	Annual	No	Retain	Yes
5	Grievances	Public Reporting	Quarterly	No	Retain	Yes
6	Organization Determinations/ Reconsiderations	Public Reporting	Quarterly	No	Retain	Yes
7	Employer Group Plan Sponsors	Monitoring	Semi-Annually	Yes, Annually	Retain	Yes
8	PFFS Plan Enrollment Verification Calls	Monitoring	Annually	No	Retain	No
9	PFFS Provider Payment Dispute Resolution Process	Monitoring	Annually	No	Retain	No
10	Agent Compensation Structure	Monitoring	Annually	N/A	Suspend	N/A
11	Agent Training and Testing	Monitoring	Annually	N/A	Suspend	N/A
12	Plan Oversight of Agents	Monitoring	Quarterly	Yes, Annually	Retain	Yes
13	Special Need Plans Care Management	Monitoring	Annually	No	Retain	Yes

Part D Reporting Requirements

#	Section	Purpose	Frequency	Reduce Frequency?	Retain/ Suspend?	Validate?
1	Enrollment	Monitoring	Quarterly	No	Retain	No
2	Retail, Home Infusion, and Long-Term Care Pharmacy Access	Monitoring	Semi-Annually: Sections A & B Annually: Sections C & D	No	Retain	Yes
3	Access to Extended Day Supplies at Retail Pharmacies	Monitoring	Annually	No	Retain	No
4	Vaccines	Monitoring	Quarterly	N/A	Suspend	N/A
5	Medication Therapy Management Programs	Public Reporting	Semi-Annually	Yes, Annually	Retain	Yes
6	Prompt Payment	Monitoring	Semi-Annually	No	Retain	No
7	Pharmacy Support of Electronic Prescribing	Monitoring	Annually	No	Retain	No
8	Generic Drug Utilization	Monitoring	Quarterly	N/A	Suspend	N/A
9	Grievances	Public Reporting	Quarterly	No	Retain	Yes
10	Pharmacy & Therapeutics (P&T) Committees/ Provision of Part D Functions	Monitoring	Quarterly	Yes, Annually	Retain	No
11	Transition	Monitoring	Annually	N/A	Suspend	N/A
12	Coverage Determinations and Exceptions	Public Reporting	Quarterly	No	Retain	Yes
13	Appeals	Public Reporting	Quarterly	No	Retain	Yes
14	Pharmaceutical Manufacturer Rebates,	Monitoring	Annually	No	Retain	No

#	Section	Purpose	Frequency	Reduce Frequency?	Retain/ Suspend?	Validate?
	Discounts, and Other Price Concessions					
15	Long-term Care (LTC) Utilization	Monitoring	Semi-Annually	Yes, Annually	Retain	Yes
16	Licensure and Solvency	Monitoring	Quarterly	No	Retain	No
17	Drug Benefit Analyses	Monitoring	Quarterly	N/A	Suspend	N/A
18	Fraud, Waste, & Abuse Compliance Programs	Monitoring	Semi-Annually	Yes, Annually	Retain	No
19	Employer Group Plan Sponsors	Monitoring	Semi-Annually	Yes, Annually	Retain	Yes
20	Oversight of Agents	Monitoring	Quarterly	Yes, Annually	Retain	Yes
21	Agent Training and Testing	Monitoring	Annually	N/A	Suspend	N/A