



CENTER FOR DRUG and HEALTH PLAN CHOICE

DATE: November 23, 2009
TO: All Prescription Drug Plan and Medicare Advantage-Prescription Drug Plan Sponsors
FROM: Cynthia Tudor, Ph.D., Director, Medicare Drug Benefit and C&D Data Group
RE: Continuation of and Important Changes to the Low Income Subsidy Match Rate Project

The accuracy of Low Income Subsidy (LIS) information that Prescription Drug and Medicare Advantage-Prescription Drug Plans have for Medicare beneficiaries is extremely important to CMS. This information is vital to ensuring that all low-income beneficiaries, especially auto-enrollees, are charged the correct premiums and co-payments for their prescription drugs.

Since the 2007 benefit year, Acumen, LLC has been assisting CMS and Part D sponsors improve the accuracy of enrollment information for LIS beneficiaries by matching monthly enrollment information submitted by Part D sponsors to the corresponding data on file in CMS' records and providing detailed monthly exception reports to Part D sponsors to facilitate resolution of any discrepancies. CMS is very pleased with the results of this effort, which currently show that approximately 99.5% of LIS beneficiaries on CMS' records have matching or more favorable premium and co-payment information on Part D sponsors' records. CMS has learned that information on LIS individuals may be contained in two different plan systems: enrollment data bases and claims payment systems. CMS reminds Part D Sponsors that the file sent for purposes of the LIS match rate should reflect the information contained in the sponsor's claims processing system. Altering or otherwise modifying the information contained on this file for purposes of improving the match rate is a violation of CMS' requirements.

LIS Match Rate Project

This memo is to inform Part D sponsors that CMS will continue the LIS match rate project for the 2010 benefit year and Acumen will continue to assist CMS and Part D sponsors in this process. All Part D sponsors will participate in this process, with the following exceptions: PACE contracts and any contracts that exclusively service U.S. territories will not be required to participate. For all other Part D sponsors, the basic process will continue as follows:

1. Sponsors will upload enrollee data to Acumen via a secure website on a monthly basis. Acumen will contact sponsors individually to specify monthly submission dates.
2. Acumen will access contract and CMS LIS data to analyze and compare the two data sets, calculate a match rate and identify exceptions. Monthly reports will be generated to track exceptions.
3. Acumen will release contract-level reports back to sponsors via a secure website.
4. CMS will monitor plan performance on on-time data submission and data accuracy.

5. CMS will publish the LIS match rate for each sponsor on the Medicare Prescription Drug Plan Finder.

Attachments to this memo detail the next steps for Part D sponsors. Attachment A explains how to obtain website access for new users. Attachment B provides an overview of the activities to be performed by Part D sponsors and Acumen.

Project Changes

Beginning January 2010, two major changes will be implemented in the LIS matching process:

1. **The Low Income Subsidy History Report will be the CMS data source for matching**, instead of the Bi-Weekly Low Income Subsidy/Premium Data File as in previous years. Changes to the required elements for data submission are detailed in Attachment B.
2. **Match rates will be based on Premium Low Income Subsidy Amount**, instead of Subsidy Percentage.

To facilitate these changes, the January 2010 submission will be considered a “pilot” period. Contracts may prepare and submit data files according to the new specifications. Acumen will validate submitted files for acceptable data and produce match rate reports; however, these will be for your information only and will not be used for compliance actions or public reporting.

Schedule of Events

In summary, the table below lists expected actions following this memo:

Action	Date
New 2010 Contracts: Identify up to five authorized users for the Acumen LIS Match Rate Website and submit contact information through the Acumen User Security Website – see Attachment A	New user requests and current user validation due by 12/4/09
Contracts Continuing from 2009: Acumen will contact sponsors to validate existing users; a list of current users will be sent to contract Medicare Compliance Officers. Validation of current users, removal of users, and submission of contact information for any new users must be conducted through this website.	
New Contracts and Continuing Contracts that authorize new users: Be prepared to receive login credentials to access Acumen LIS Match Rate Website	Rolling-basis, following user authorization
All Contracts: Review the “Overview of the LIS Data Matching Process” in Attachment B and ensure authorized users are familiar with the process and data variables.	No later than 12/4/09
All Contracts: 2010 Test Period	12/22/09 to 1/1/10
Users may access the LIS Match Rate Website to navigate the features and download a test file (provided by Acumen).	
All Contracts: 2010 Pilot Period	1/6/10 to 1/8/10
Contracts may prepare and upload “pilot” data. Acumen will validate the file layout – users will receive notice whether the file would have been accepted or rejected. Match rate reports will be produced, but will not count towards your annual match rate.	

All Contracts: Regular Submission

Contracts submit production data for LIS matching. Official LIS Match Rate Reports will be produced.

2/10/10 to 2/12/10
and reoccurring
monthly thereafter

CMS appreciates your cooperation with Acumen, LLC and all of your efforts in making the LIS matching project a success. If you have any questions about this project or process, please contact Acumen at LIS@acumenllc.com or (650) 558-8006.

ATTACHMENT A: User Authorization Instructions

Acumen has created a website to facilitate the LIS Match Rate process. Part D sponsors will use the LIS Match Rate Website to upload data, download reports, and communicate with Acumen. This secure website will be accessible only to authorized participants, with each sponsor utilizing a space on this site that is separately secured from all other participants. The website will facilitate the communication, tracking, and resolution of contract-specific issues through use of discussion boards and reports exclusive to the Part D sponsor's designated representatives.

In accordance with Federal Information Security Management Act (FISMA) regulations, only the Medicare Compliance Officer is authorized to give access to our websites for each contract. To streamline this process, Acumen has developed the User Security Website – a web tool that allows Medicare Compliance Officers to manage their users on the Acumen websites.

Medicare Compliance Officers should take the following steps to grant access to the LIS Match Rate Website:

- 1. Identify individuals who should have access to the LIS Match Rate Website.**
 - Contracts are limited to **five** authorized users.
 - All users will have access to all features of the LIS Match Rate Website, including uploading data, downloading match rate reports, and accessing discussion boards. All users will also receive emails regarding data submissions and report availability.
 - As reports contain information for specific beneficiaries, users must be authorized to access identifiable beneficiary data.

- 2. Log onto the User Security Website (https://PartD.ProgramInfo.US/User_Security).**
 - *If you are a Part D sponsor that was active in 2009*, your current Medicare Compliance Officer should already have access to the User Security Website through existing work with Acumen.
 - *If you are a new Part D sponsor for 2010*, you should have recently received or will soon be receiving a welcome email and a letter with login credentials via USPS. Please contact LIS@acumenllc.com if you have not received a welcome letter by December 3, 2009.

- 3. Authorize users.** The Medicare Compliance Officer must submit an Available User Request Form for each proposed user and authorize access permissions for each user.
 - To ensure timely access to the LIS Match Rate Website, Medicare Compliance Officers must complete the user authorization process by **December 4, 2009**.

Acumen will send authorized LIS Match Rate Website users an email with a username, website user guide and details on file creation and variables and a letter with a login password via USPS.

If you are an existing Part D sponsor that participated in the LIS Match Rate process in 2009, you will be receiving an email listing the current authorized users for your contract. If you would like to make any changes, please log on to the User Security Website to add or remove users by **December 4, 2009**.

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

ATTACHMENT B: Overview of the LIS Data Matching Process

This attachment gives an overview of the LIS Match Rate process. More detailed information on variables and file creation will be provided in a User Guide to authorized website users.

Initial Setup Steps

Acumen will send welcome emails to website users authorized by Medicare Compliance Officers. These emails will include usernames and detailed instructions for submitting data and downloading reports. Login letters containing login passwords will arrive separately via USPS.

Step 1: Upload Data

Contracts must upload data on a monthly schedule. The format of submitted data sets will be comma delimited text files, zipped using standard archiving software. Detailed information about file structures is available on the website. Acumen will validate data submissions to check formats and structure, and authorized LIS Match Rate Website users will be expected to resolve any data upload issues by correcting data structures and resubmitting files.

The following table lists the specific variables that will be requested. **These variables are slightly different from the variables required in 2009.** Each data file should contain all Part D beneficiaries currently enrolled each month, one row per beneficiary.

Variables for All Part D Beneficiaries

1. Beneficiary's Claim Account Number (HIC)
 2. Contract Number (MCO Contract Number)
 3. Plan Benefit Package (PBP) Number
 4. PBP Start Date
 5. Beneficiary Gender
 6. Beneficiary Date of Birth
 7. Net Part D Premium Amount
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Additional Variables for LIS Eligible Beneficiaries

8. Low Income Period Start Date
 9. Low Income Period End Date
 10. Low Income Premium Subsidy Percentage
 11. Premium Low Income Subsidy Amount
 12. Low Income Co-pay Level ID
 13. Beneficiary Source of Subsidy Code
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Step 2: Reporting

Acumen will process submitted contract data and link beneficiary records with those contained in CMS files to calculate LIS match rates. Reports will be made available to contracts presenting match rates and identifying those specific cases not matching in CMS and contract files. For this reason, LIS Match Rate Website users must be limited to people with authorization to access the beneficiary level identifiable information contained in these reports.