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TO: All Part D Sponsors

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SUBJECT: Process for Part D Sponsors to Request Changes to a Medication Therapy Management Program

DATE: March 3, 2011

To promote evolving Medication Therapy Management (MTM) best practices and to serve the best interests of the Medicare beneficiary, CMS allows certain mid-year changes to the Part D sponsors' approved Medication Therapy Management Program (MTMP) during three Update Cycle windows: **March 1-March 10, June 1-June 10, and September 1-September 10**. All proposed MTMP changes must be submitted to CMS for review and approval prior to the implementation of requested changes.

Each Part D sponsor is required to incorporate an MTMP into their Plans' benefit structure. Each spring, during the Annual Review, sponsors must submit an MTMP description to CMS for review and approval. For approval, a sponsor's MTMP must be in compliance with 42 CFR §423.153(d) and related CMS guidance. A CMS-approved MTMP is one of several required elements in the development of sponsors' bids. The MTMP requirement does not apply to MA Private Fee for Service (MA-PFFS) organizations, as described in 42 CFR §422.4 (a)(3). However, considering MA-PFFS organizations have an equal responsibility to provide a quality Part D product, CMS encourages MA-PFFS organizations to establish an MTMP to improve quality for Medicare beneficiaries.

The following instructions for submitting MTMP change requests updates the previous instructions provided on July 22, 2009 for all Part D sponsors.

Q: What changes can Part D sponsors make to their CMS-approved MTMP?

A: Part D sponsors may have experiences during the current contract year that identify the need for changes to the current program year MTMP or to the upcoming contract year program. Negative changes will generally not be accepted. We have a 4 part policy regarding MTMP changes.

1. Part D sponsors may make *positive* changes to the plan-designed eligibility criteria for multiple chronic diseases, multiple covered Part D drugs, or analytical procedures used to determine if a beneficiary is likely to incur annual costs in excess of a predetermined level as specified by the Secretary. These changes would make the eligibility more inclusive and could increase the number of beneficiaries eligible to receive Part D MTM services. Positive changes may include:
 - a. Decreasing the minimum number of multiple chronic diseases,
 - b. Expanding the list of specific chronic diseases that apply,
 - c. Decreasing the minimum number of multiple covered Part D drugs,
 - d. Expanding the list of specific covered Part D drugs, or types of drugs, that applies.
2. Part D sponsors may make program enhancements or maintenance changes that include changes to:
 - a. Frequency of identification to increase or promote ease of beneficiary participation,
 - b. Expand the levels of intervention or service provided to targeted beneficiaries,
 - c. Methods of documenting and measuring outcomes.
3. Part D sponsors may make changes to the following:
 - a. The provider of MTM services,
 - b. Any fee schedules established for pharmacists and other MTM providers if using outside personnel. The CMS will request that Part D sponsors disclose the newly established fees for outside personnel.
4. Part D sponsors may not make any negative changes to their MTMP. While the following list is not exhaustive, potentially negative changes include changes that:
 - a. Promote discriminatory or exclusionary practices,
 - b. Decrease the number of enrollees eligible for MTM Services,
 - c. Lower quality or robustness of MTM services.

Q: Can Part D sponsors adjust their bid based on changes to their CMS-approved MTMP?

A: No. A CMS-approved MTMP is required for all approved Part D sponsors, other than Part D sponsors whose only plans are PFFS plans. CMS considers MTMP to be an administrative cost that is included in each plan's bid and premium. Part D sponsors may not adjust their bids based on requested changes to their CMS-approved MTMP.

Q: When should Part D sponsors submit a request to make a change to their MTMP?

A: Once an MTMP is approved by CMS during the Annual Review, limited changes to the Part D sponsors' MTMP may be allowed in accordance with CMS policy. All proposed MTMP changes must be submitted to CMS for review and approval prior to the implementation of requested changes in the manner described below.

MTMP requests for changes during the program year may be submitted to CMS during any of the three Update Cycle windows: **March 1-March 10, June 1-June 10, and September 1-September 10**. For example, a Part D sponsor may request an MTMP change between September 1 and September 10, 2011 for a contract year 2011 MTMP.

Requests for changes to an approved MTMP that would be effective for an upcoming program year should be submitted to CMS during the following Update Cycle window: **September 1 and September 10**. For example, a Part D sponsor may request an MTMP change between September 1 and September 10, 2011 for a contract year 2012 MTMP approved during the Annual Review in spring 2011 which will be implemented on January 1, 2012.

Q: How should Part D sponsors submit a request to make a change to their MTMP?

A: The MTMP change request should be submitted through the Health Plan Management System (HPMS) in the appropriate contract year MTMP Submission module under “Plan Formularies.” This interface was established to enable Part D sponsors to enter, edit, and submit their MTMP descriptions within HPMS at the contract level. A technical user’s manual for accessing the HPMS, navigating through the MTMP Submission module, and performing Plan functions is available for download through the HPMS MTMP submission module. A user’s manual will be available for each contract year module.

The MTMP submission gates to enter/edit the MTMP will automatically be open during the Update Cycle windows. The former ‘MTMP Change Request Form’ is now integrated within the enter/edit function of the MTMP submission module for the Update Cycles. For any submissions made in the Update Cycles due to update, resubmission required, and contract exception, a sponsor is required to enter information in the Change Request Form Description field(s) to justify the change on the Enter/Edit pages and check the attestation, "I attest that the following change(s) do not impact approved MTM marketing materials or such marketing materials will be submitted and approved by CMS as necessary prior to implementation of the change." on the Verify Submission page.

Q: How will I know if my MTMP change request has been approved?

Part D sponsors will receive an email correspondence regarding the approval of the MTMP. Part D sponsors must not implement such changes until they receive explicit notification of approval from CMS and must not submit any changes to marketing material until receiving explicit and affirmative CMS approval. Depending upon the number of submitted requests, plans should expect a response within 30 days.

We appreciate your continued cooperation in administering the Medicare drug benefit. Questions regarding the MTM Change Request process should be sent via email to partd_mtm@cms.hhs.gov. If you have any questions on accessing the HPMS MTMP module, please contact the HPMS Help Desk at 1-800-220-2028.