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

CENTER FOR MEDICARE

DATE: October 19, 2012

TO: All Part D Sponsors

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

SUBJECT: Request for comments regarding enhancements to the Patient Safety Analysis
                Website

The purpose of this memo is to request comments from Part D sponsors regarding enhancements to the Patient Safety Analysis Website. We are requesting feedback on the website reports and features to improve the usability and meaningfulness of the website by Sponsors. At this time, we are not asking for comments on the patient safety measure calculations or the Part D Plan Ratings, as those will be requested at a later time.

Background

Performance and quality measures are used by CMS so Medicare beneficiaries have the information necessary to make informed enrollment decisions by comparing available health and prescription drug plans. They also provide measures of quality across Part D sponsors. As part of this effort, CMS currently calculates and reports on eight patient safety measures:

- High Risk Medication (HRM) measure *
- Diabetes Treatment (DT) measure *
- Part D Medication Adherence (ADH) for Cholesterol (Statins)*
- Part D Medication Adherence (ADH) for Hypertension (RAS Antagonists)*
- Part D Medication Adherence (ADH) for Oral Diabetes Medications*
- Drug-Drug Interaction (DDI) measure**
- Diabetes Medication Dosage (DMD) measure**
- Part D Medication Adherence for HIV/AIDS (Antiretrovirals)***

  *Part D Plan Rating on the Medicare.gov Plan Finder   **Part D Display Measure on CMS.gov   ***Part D Patient Safety Report (only)

Part D sponsors currently have access to monthly Patient Safety Reports via the Patient Safety Analysis Website to compare their performance to overall averages and monitor their progress in improving the prescription drug patient safety measures. These actionable reports include contract-level patient safety reports for each measure, additional detail-level reports, and outlier reports. In addition to downloading monthly reports, Sponsors can also view an 'at-a-glance' Rate Summary and Performance Graphs for each measure, and respond to Outlier Reporting directly on the website. The website facilitates communication between CMS, the plans, and our contractor, Acumen, LLC. Sponsors are required to use the website and should be engaged in performance monitoring. For additional

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information, User Guides and the NDC-level medication lists used to calculate the measures are available on the Patient Safety Analysis Website under Help Documents.

Request for Comments

Your suggestions will help CMS make enhancements to the Patient Safety Analysis Website. **Please submit only one set of comments per organization to PartDMetrics@cms.hhs.gov by November 2, 2012. Include "Patient Safety Analysis Website Comments" in the email subject line along with your organization name and Part D contract number(s) in the body of the email.** Comments should be limited to the reports and features of the Patient Safety Analysis Website. Sponsors will have the opportunity to comment on the patient safety measure calculations or the Part D Plan Ratings at a later time.

The reports we currently provide through the website are listed in the Appendix at the end of this memo. A number of enhancements are already in development based on feedback that CMS and Acumen have received, including full detail-level denominator files (.csv format) for each measure. These are also listed in the Appendix.

Some questions to consider when providing feedback are:
- What reports or information do you find useful?
- What reports or information are not useful?
- How do you utilize the summary-level and detail-level information provided in the reports?
- Are the reports easy to access and navigate?
- Are the additional resources (e.g. Website User Guide, Report User Guides) provided through the website helpful and easy to understand?
- What additional reports or information would help you monitor your performance and help you improve in these patient safety areas?
- Do you have any comments regarding the additional website features (such as, Rate Summary, Performance Graphs, or Outlier Reporting)?

Access to the Patient Safety Analysis Website

To access the Patient Safety Reports, you must be an authorized user of the Patient Safety Analysis Website. CMS' contractor, Acumen, LLC, currently manages multiple websites for Medicare Part D contracts, including the Patient Safety Analysis Website. In accordance with Federal Information Security Management Act (FISMA) regulations, only the Medicare Compliance Officer is authorized to give access to these 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 Part D websites. To add or modify users and assign them permissions to the Patient Safety Analysis Website, the Medicare Compliance Officer must log onto the User Security Website (https://partd.programinfo.us/User_Security). For security purposes, each contract is allowed up to five users.

Once users have been added, Acumen will send these authorized Patient Safety Analysis Website users:
- An email with the login username and website user guide
- A letter with login password via USPS

Any general questions related to this Patient Safety Analysis project should be sent via email to PartDMetrics@cms.hhs.gov. For technical questions related to website or report access, please contact Acumen at PatientSafety@AcumenLLC.com or by phone at (650) 558-8006.

Thank you for your participation.

Appendix
Patient Safety Analysis Website: Currently Available Reports and Enhancements in Development

Measure	Available Reports
High Risk Medication (HRM) measure	Performance Graph
	Measure Summary
	Rate History by Month
	Rates by Drug Class *(in development)*

	Top 100 service-providers
	    by HRM Fill Rate
	    by Beneficiaries

	Prescriber-level analyses *(in development)*
	Claim-level report (full list of potential HRM fills)
Diabetes Treatment (DT) measure	Performance Graph
	Measure Summary
	Suboptimal Treatment by Drug Class

	Prescriber-level Analyses
	    Suboptimal Diabetes Treatment
	    By Drug Class

	Beneficiary-level Analyses (top 1000 beneficiaries by days suboptimal)
	Claim-level report (beneficiaries' suboptimal treatment fills)
	Full denominator beneficiary-level detail file
Drug-Drug Interaction (DDI) measure	Performance Graph
	Measure Summary
	Rate History by Month
	Rates by Drug Class

	Prescriber-level Analyses
	    DDI
	    DDI by Drug Class

	Beneficiary-level Analyses (top 1000 beneficiaries by days of potential DDI exposure)
	Claim-level report (beneficiaries' potential DDI fills)
	Full denominator detail file *(in development)*

Measure	Available Reports
Diabetes Medication Dosage (DMD) measure	Performance Graph
	Measure Summary
	Rate History by Month
	Rates by Drug Class

	Prescriber-level Analyses
	   DMD
	   DMD by Drug Class

	Beneficiary-level Analyses (top 1000 beneficiaries by DMD fills)
	Claim-level report (beneficiaries' DMD fills)
	Full denominator detail file *(in development)*
Part D Medication Adherence (ADH) measures	Performance Graphs by Drug Class (Cholesterol, Diabetes, Hypertension)
	Measure Summary
	Rates by Diabetes Drug Type
	Beneficiary-level Analyses (non-adherent beneficiaries) Addition of adjusted and unadjusted Proportion of Days (PDC) fields based on Inpatient (IP) Stays *(in development)*
	Full denominator beneficiary-level detail file