

LIS Data Changes

LIS Data: Goals

- Improve the flow of LIS eligibility data to Part D Plans
- Enable Plans to clearly recognize LIS status changes for both current and previous enrollees
- Communicate accurate and transactable data to Plans as quickly as possible.
- Provide changed LIS data to Plans in a timely manner to ensure that Plans charge LIS beneficiaries the correct premium, deductible and co-payment amounts for the correct effective dates.

LIS Data: Improvements

- CMS no longer identifies specific LIS changes. Instead, CMS provides full replacement LIS profiles in response to low income changes that accumulate over the weekly and monthly reporting cycles

Operational Impact for Plans

- **Transaction Reply Report**
 - Layout was modified; New Fields were added.
 - Existing field definitions were changed
- **Transaction Reply Codes**
 - LIS codes are TRC-121, 194 and 223

Business Impact for Plans

- Efficient processing of LIS data
 - Notifications on the TRR are NOT tied to CPM.
 - Plans can transact LIS status directly from the TRR Weekly Report.
- Less comparison of reports for LIS data
 - LIS status on the TRR is the definitive source of LIS status
 - Pertinent LIS status information is in one place

Other LIS Reports

- Data Hierarchy Guidance
 - Issued guidance on **June 9, 2009** that replaced February 5, 2008 HPMS memo
 - Also found in Chapter 13 and PCUG
- Other Files with LIS data
 - Continuing to reviewing the inventory of files
 - Determining usefulness of LIS information
 - Modifying/Eliminating where necessary

Other LIS Reports: LISHIST

- LIS History Report (weekly/monthly)
 - Modified in November 2009
 - One field modified; 3 additional fields added
 - Generated on TRR schedule, not CPM schedule
 - Now used by Acumen to determine LIS match rate
 - See November 23, 2009 HPMS memo
 - Remains as a comprehensive report of **currently enrolled** LIS members
 - Provides 36 consecutive months enrollment history

FAQs: Best Available Evidence

- May 11, 2009 HPMS memo
 - Required plans to submit LIS evidence **with the request to Reed and Associates.**
 - Why?
 - Reed should only update for deemed benes
 - Plans were submitting for LIS applicants
 - Left an open question
 - **What to do about LIS applicant updates?**

FAQs: Best Available Evidence

- LIS applicant information comes from SSA
- CMS/SSA have no way to automatically synch information
 - Updates in CMS systems will put us further out of synch
 - CMS/SSA are working together to resolve this issue
 - Plans should continue to maintain an exceptions processing method to address LIS awards

FAQs: LIS Letters

- What's the difference between:
 - The Loss of LIS letter (appendix B of Chapter 13)?
 - The Removal of LIS period (appendix C of Chapter 13)?
- When do I send each letter?
- Do I send a removal letter for a future LIS period (i.e. 1/1/2011 with no end date)?
- How long do I have to send the LIS rider after notification?

Appendix B vs. Appendix C

Appendix B – Loss of LIS letter (model 7006)

- Informs beneficiary that they have lost LIS as of a certain date
 - Deemed: Date is 1/1/XX
 - Applicants: Date is sent on TRR
- Contains variable language for deemed and applicants
- Primarily sent
 - End of year – after receipt of Loss of Subsidy file
 - During the year – LIS applicants who lose LIS

Appendix B vs. Appendix C

Appendix C – Removal of LIS Period (Model 7012)

- Informs beneficiary that LIS for a retroactive period was removed or changed, but they still have LIS
- Does not contain variable language for deemed and applicants
- Primarily sent during the year to deemed or applicant who has a retroactive change
- Make sure plans follow up with refunds or recoupments of cost sharing as outlined in Section 70.3.1 of Chapter 13

Appendix B vs. Appendix C

Appendix C – Removal of LIS Period

- Do I send a removal letter for a future LIS period (i.e. 1/1/2011 with no end date)?
 - No – the removal letter is meant for retroactive period. Therefore a removal letter is **NOT** necessary.

LIS Rider Requirements

How long do I have to send the LIS rider after notification?

Answer: Section 70.2 of Chapter 13 – Member notifications

- 30 days of receiving systems notifications

But...we don't have our new benefit package loaded yet?

*“When notifications are received starting in July, that an individual is re-deemed for the following calendar year, the LIS rider conveying the following year's status **need not be sent until the combined ANOC/EOC.**”*

LIS Guidance and Resources

- Model notices
 - Chapter 13 of Prescription Drug Benefit Manual
 - LIS rider – Marketing Guidelines
- LIS Improvements -
 - Software Release memo – 1/7/09 and 4/10/2009 (Reporting LIS information on the TRR)
- LIS History Report Changes
 - Software Release memo – 8/12/09 (LISHIST report changes)

LIS Guidance and Resources

- Best Available Evidence (BAE)
 - Policy – HPMS memo – 8/4/08
 - Updating CMS systems – HPMS memo – 5/11/09
- Yearly Beneficiary Redeeming
 - HPMS memos – 8/28/09 and 11/30/09
- Reimbursing for retroactive effective dates
 - Section 70.3.1 of Chapter 13

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