

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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