



CMS 2010 MEDICARE ADVANTAGE & PRESCRIPTION DRUG PLAN SPRING CONFERENCE
Sheraton Baltimore City Hotel, April 20-21, 2010
Verbatim Transcript
Low Income Subsidy Data Change

GOOD MORNING. I'M GOING TO
TALK A LITTLE BIT ABOUT

LIS DATA AND WHAT IT IS
THAT WE'RE TRYING

TO ACCOMPLISH WHEN WE SEND
THE INFORMATION TO YOU.

SPECIFICALLY

WE WOULD LIKE TO IMPROVE

THE FLOW OF LIS
ELIGIBILITY TO THE DATA

THAT WE SEND
TO THE PLANS.

WE WANT TO ENABLE THE PLANS
TO CLEARLY RECOGNIZE

LIS STATUS CHANGES

FOR BOTH CURRENT
AND PREVIOUS ENROLLEES.

AND WE ALSO SEND PROSPECTIVE
INFORMATION AS WELL.

WE ALSO WOULD LIKE TO
COMMUNICATE ACCURATE

AND TRANSACTABLE DATA
TO PLANS

AS QUICKLY AS POSSIBLE,
WHICH WAS SOMETHING THAT WE

HAD BEEN WORKING TOWARDS UP
UNTIL LAST YEAR, WHEN WE

FINALLY GOT THE INFORMATION

ON THE TRR--

THE TRANSACTION
REPLY REPORT, WHICH

I'M GOING TO TALK
A LITTLE BIT ABOUT.

AND FINALLY WE WANT TO
PROVIDE ANY CHANGES

IN LIS DATA IN A TIMELY
MANNER TO ENSURE THAT

PLANS CHARGE
LIS BENEFICIARIES

THE CORRECT
COST-SHARING.

AND THAT MEANS PREMIUMS,
DEDUCTIBLES,

CO-PAYMENT AMOUNTS

FOR THE CORRECT
EFFECTIVE DATES.

SO IN TRYING TO
ACCOMPLISH THESE GOALS,

THEY SPEAK DIRECTLY TO
THE FRUSTRATIONS THAT

WERE PREVIOUSLY
EXPRESSED BY PLANS

ABOUT LIS ELIGIBILITY
ISSUES.

OVER THE COURSE OF
THE LAST TWO YEARS,

WE'VE MADE SIGNIFICANT
IMPROVEMENTS IN THE WAY

THAT WE REPORT LIS DATA.
AS YOU KNOW, WE NOW

REPORT THE DATA

ON THE TRANSACTION
REPLY REPORT.

SO PLANS CAN PUT
THAT INFORMATION

INTO THEIR SYSTEMS AND
QUICKLY TRANSACT

ON THE DATA. AND INSTEAD
OF PROVIDING PIECES

OF INFORMATION ABOUT
LIS, WE NOW SEND WHAT WE

CALL A PROFILE.
AND THIS PROFILE HAS

SEVERAL ELEMENTS THAT
GIVE A MORE COMPLETE

SNAPSHOT OF THE LIS
STATUS THAN WHAT WE

PREVIOUSLY USED TO SEND.

THE KEY ELEMENTS OF
THE PROFILE ARE

THE START DATE OF LIS;

THE END DATE,
IF IT'S ENDED;

THE CO-PAYMENT LEVEL;
THE PREMIUM SUBSIDY

AMOUNT, THE ENROLLEE
TYPE, MEANING

IF THE PERSON IS
A CURRENT ENROLLEE,

WHETHER THEY'RE A FUTURE
ENROLLEE, OR WHETHER

THEY'RE A PRIOR
ENROLLEE.

AND PREVIOUSLY WE
WEREN'T ABLE TO SEND

THAT INFORMATION. SO
THAT'S SOMETHING THAT

PLANS HAVE GIVEN
FEEDBACK THAT THIS IS

VERY HELPFUL. AND, ALSO,
THE SUBSIDY SOURCE CODE.

AND THIS MEANS WHETHER
OR NOT THE BENEFICIARY

IS EITHER DEEMED

OR IF THEY'RE
AN LIS APPLICANT.

THE IMPROVEMENTS THAT
WE MADE HAVE

OPERATIONAL IMPACTS ON
THE PLANS.

AND WE RECOGNIZE THAT
BECAUSE WE MODIFIED

THE LAYOUT OF THE
TRANSACTION REPLY REPORT

TO INCLUDE THE ELEMENTS

THAT I JUST TALKED
ABOUT.

AND WE ALSO STREAMLINED

THE LIS TRANSACTION
REPLY CODES,

THOSE TRC DEFINITIONS.
THERE USED TO BE 4.

AND SO NOW THERE'S 3.
AND WE CHANGED

THE DEFINITION A BIT.
AND, HOPEFULLY, IT'S

BEEN MORE HELPFUL.
ADDITIONALLY, WE HOPE

THAT THERE HAS BEEN A
BUSINESS IMPACT AS WELL

FOR MANY PLANS. I TALKED
WITH SEVERAL PLANS.

AND WE FREQUENTLY TALKED
ABOUT SOME OF

THE SOPHISTICATED
WORK-AROUNDS

FOR THE INFORMATION

AND THE DIFFERENT
REPORTS

THAT WE WERE SENDING
RELATED TO LIS.

SO THE IMPROVEMENTS THAT
WE'VE MADE ARE THAT

THERE'S MORE EFFICIENT
PROCESSING OF LIS DATA,

THAT THE NOTIFICATIONS

ON A TRANSACTION REPLY
REPORT ARE

NOT TIED TO THE CURRENT
PROCESSING MONTH,

WHICH IS THE
MONTH-END PROCESSING

I'M SURE YOU'RE ALL
FAMILIAR WITH.

AND PLANS CAN TRANSACT
THE DATA DIRECTLY

FROM THE WEEKLY REPORT.
THERE'S ALSO

LESS COMPARISON OF THE
REPORTS TO THE LIS DATA.

AND ALL
THE INFORMATION IS

PRIMARILY IN ONE PLACE.

AND THE TRANSACTION
REPLY REPORT HAS NOW

BECOME
THE DEFINITIVE SOURCE

OF LIS INFORMATION.
SO THE NEXT FEW SLIDES

THAT I'M GOING TO TALK
ABOUT ARE IN RESPONSE

TO SOME OF THE QUESTIONS
THAT I NORMALLY GET

ABOUT LIS POLICY
AND GUIDANCE. OK.

SO THERE ARE A NUMBER
OF REPORTS THAT YOU

RECEIVE, AT LEAST 11 OR
12. THEY HAVE LIS FIELDS

AND DATA
AND THAT SORT OF THING.

ON JUNE 9, 2009,
WE ISSUED A GUIDANCE

THAT ACTUALLY REPLACED
THE FEBRUARY 5 HPMS MEMO

THAT GAVE GUIDANCE ABOUT
WHICH REPORTS SHOULD BE

USED FOR WHICH PURPOSES,
WHICH, HOPEFULLY,

CLARIFIED FOR PLANS HOW
TO GO ABOUT TO USE

THAT INFORMATION. AND
THE INFORMATION THAT'S

IN THE DATA HIERARCHY
GUIDANCE CAN ALSO BE

FOUND IN CHAPTER 13,
WHICH IS

THE PRESCRIPTION DRUG
MANUAL, WHICH WE REFER

TO AS THE LIS CHAPTER.

AND "THE PLAN COMMUNICATIONS
USER GUIDE," WHICH IS

THE TECHNICAL DOCUMENT

THAT MOST OPERATIONS

FOLKS USE.

SO I MADE SURE
THAT IT WAS

IN A NUMBER
OF DIFFERENT PLACES,

SO DIFFERENT PARTS OF
AN ORGANIZATION WOULD

HAVE ACCESS TO IT. AS
FAR AS THE OTHER FILES

WITH LIS DATA,
I HAVE TO SAY

THAT WE'RE CONTINUING
TO REVIEW THE INVENTORY

OF THOSE FILES
AND DETERMINING

THE USEFULNESS OF
THAT LIS INFORMATION.

AND WE ARE GOING TO
EVENTUALLY TRY TO MODIFY

OR ELIMINATE ANY
REPORTS THAT ARE

UNNECESSARY OR
REDUNDANT IN ANY WAY.

I USED TO GET A LOT
OF QUESTIONS,

BUT IT SEEMS THAT THAT'S
NO LONGER THE CASE.

SO HOPEFULLY I'M GOING
TO TAKE THAT AS A SIGN

THAT WE'RE ACCOMPLISHING
OUR GOALS.

ONE OF THE REPORTS THAT
I GET A LOT OF QUESTIONS

ON IN COMPARISON TO THE
TRANSACTION REPLY REPORT

IS THE LIS

HISTORY REPORT.

THIS IS A MONTHLY
REPORT.

ACTUALLY,
THE SLIDE'S INCORRECT.

IT'S A MONTHLY REPORT
THAT WE RECENTLY

MODIFIED IN NOVEMBER.
AND UP UNTIL THE CHANGES

THAT WE MADE ON THE
TRANSACTION REPLY REPORT,

THIS WAS USUALLY THE REPORT
THAT MOST PLANS LOOKED TO

ABOUT INFORMATION ABOUT
THEIR LIS NUMBERS.

WE DID MODIFY IT.
WE MODIFIED ONE FIELD.

AND WE ACTUALLY ADDED
3 ADDITIONAL FIELDS.

AND WE CHANGED THE
GENERATION DATE OF IT.

IT USED TO BE GENERATED

ALONG WITH THE MONTH-END
PROCESSING, WHICH WAS

ACTUALLY IN THE MIDDLE
OF THE MONTH.

WE CHANGED IT TO
AN ACTUAL CALENDAR MONTH

PROCESSING.
THIS FILE IS ALSO USED

BY ACUMEN NOW TO
DETERMINE

THE LIS MATCH RATE.

AND IF YOU WANT MORE
INFORMATION ABOUT THAT,

YOU CAN SEE
THE NOVEMBER 23 MEMO,

HPMS MEMO, ABOUT THOSE
CHANGES.

THE LIS HISTORY REPORT,
WE'RE STILL SENDING THAT

IN ADDITION TO THE
TRANSACTION REPLY REPORT,

BECAUSE IT DOES STILL
REMAIN TO BE

A COMPREHENSIVE REPORT

OF YOUR CURRENTLY
ENROLLED MEMBERS.

THINK OF IT AS SORT OF
LIKE AN MMR REPORT IS

OF YOUR ENTIRE
MEMBERSHIP. WELL, THIS

IS A REPORT OF YOUR
CURRENT LIS MEMBERSHIP.

AND THEN WE'LL GIVE YOU

A 36 CONSECUTIVE MONTH
HISTORY OF LIS MEMBERS

THAT ARE ENROLLED
IN YOUR PLAN.

LIKE I SAID, IT'S STILL
A VALID REPORT.

WE DON'T HAVE ANY PLANS
TO PHASE IT OUT.

WE ARE STILL LOOKING AT

ANY ADDITIONAL
MODIFICATIONS TO MAKE IT

EVEN MORE USEFUL AND
MAKE SURE THAT THE DATA

DOESN'T CONFLICT WITH
THE TRR

AND IT'S NOT CONFUSING.
SO AS YOU KNOW,

IT'S AN ONGOING PROCESS.
ANOTHER SET OF QUESTIONS

THAT I GET IS RELATED TO
BEST AVAILABLE EVIDENCE,

WHICH, AS YOU KNOW, IS
THE POLICY WHERE

IF CMS--EITHER CMS
OR THE PLANS--HAVE

INFORMATION THAT
A PERSON HAS LIS,

AND A MEMBER BELIEVES
THAT IT'S INCORRECT,

THEY CAN PROVIDE
THE EVIDENCE--THE BEST

AVAILABLE EVIDENCE TO
THE PLAN IN ORDER TO

GET A CORRECTED
COST-SHARING LEVEL.

SO THE MAY 11, 2009,
MEMO REQUIRED THE PLANS

TO SUBMIT EVIDENCE WITH
THE REQUEST

TO REED AND ASSOCIATES.
AND THIS WAS BECAUSE

THE CONTRACTOR, REED AND
ASSOCIATES,

ONLY SHOULD BE UPDATING
FOR DEEMED INDIVIDUALS.

AND WE WERE FINDING THAT
PLANS WERE SUBMITTING

INFORMATION FOR
LIS APPLICANTS.

BEFORE, YOU
DIDN'T HAVE TO SEND IN

THE DOCUMENTATION. SO IN
ORDER TO REMEDY THAT,

WE CHANGED THE PROCESS
SO WE COULD VERIFY

UP FRONT BEFORE WE MADE
THE CHANGES

TO A BENEFICIARY RECORD
THAT THEY WERE

ACTUALLY DEEMED
INDIVIDUALS.

AND THIS IS BECAUSE FOR
LIS APPLICANTS,

SOCIAL SECURITY MAKES
THE DETERMINATION

FOR THE AWARD, NOT CMS.
AND SO THAT'S THE REASON

WHY WE DON'T WANT TO
CHANGE THE RECORD

WITHOUT GOING THROUGH
SOCIAL SECURITY.

AND I'LL TALK
A LITTLE BIT ABOUT THAT

ON THE NEXT SLIDE. BUT
AGAIN, LIKE I SAID,

IT USUALLY LEAVES
AN OPEN QUESTION FOR

MOST PLANS WHEN THEY
CALLED AND SAID, "WELL,

WHAT AM I SUPPOSED TO DO
ABOUT THE LIS APPLICANT?"

BECAUSE THE GUIDANCE IS
THAT, YOU KNOW, YOU

SUBMIT IT TO REED.
YOU WAIT 45 TO 60 DAYS

OR SO, AND EVENTUALLY,
IT'LL COME ON THE TRR,

AND YOU CAN UPDATE
YOUR SYSTEMS.

BUT IN THE CASE FOR
LIS APPLICANTS,

A LOT OF TIMES, IT'S
NOT UPDATED AS QUICKLY.

AND SO I GET THAT LAST
QUESTION THERE,

"WHAT TO DO ABOUT
LIS APPLICANTS?"

AND WHAT I CAN SAY IS
THAT, LIKE I SAID,

LIS APPLICANT INFORMATION
COMES FROM SOCIAL SECURITY.

AND RIGHT NOW, CMS
AND SOCIAL SECURITY

DO NOT HAVE A WAY

TO AUTOMATICALLY SYNCHRONIZE
OUR INFORMATION.

SO UPDATES--ANY CHANGES
TO THE CMS SYSTEM

WILL PUT US FURTHER OUT
OF SYNCHRONIZATION

WITH THE SSA. WE
CURRENTLY ARE WORKING

WITH SSA--ACTUALLY, YOU
KNOW, WE MEET FREQUENTLY

TO TRY AND RESOLVE
OUR SYSTEMS ISSUES

TO BE ABLE TO GET THIS
INFORMATION,

BUT PLANS SHOULD
CONTINUE TO MAINTAIN

AN EXCEPTIONS
PROCESSING SYSTEM,

WHICH MEANS THAT

BASICALLY

YOU SHOULD HAVE A WAY TO
OVERRIDE WHAT YOU HAVE

IN YOUR SYSTEM TO GIVE
INDIVIDUALS THE BEST--

THE EVIDENCE, BASED ON
THE BEST AVAILABLE

EVIDENCE THAT THEY'VE
SUBMITTED.

ANOTHER GROUP OF QUESTIONS
THAT I NORMALLY GET IS

ABOUT BENEFICIARY
NOTIFICATION RELATED

TO LIS, PRIMARILY

WHAT TO DO WITH SOME OF
THE LETTERS THAT ARE

IN CHAPTER 13 AND WHEN
TO SEND THOSE LETTERS.

SPECIFICALLY THESE 4
QUESTIONS ARE PRIMARILY

THE ONES THAT I ANSWER.
THE DIFFERENCE BETWEEN

THE LOSS OF LIS--LETTER,

WHICH IS ACTUALLY
APPENDIX "B"

IN CHAPTER 13, AND THE
REMOVAL OF THE LIS PERIOD,

WHICH IS APPENDIX "C"
IN CHAPTER 13.

THE QUESTIONS ARE, WHEN
DO I SEND EACH LETTER?

WHEN DO I SEND
A REMOVAL LETTER

FOR A FUTURE PERIOD?

HOW LONG DO I HAVE TO

SEND THE LIS RIDER?

I'LL TALK ABOUT THAT
AS WELL.

THE APPENDIX "B" LETTER,

I WANT TO COMPARE
THE TWO

ON THE NEXT FEW SLIDES.

SO THE APPENDIX "B"
LETTER IS CALLED

THE LOSS OF LIS LETTER.
WHAT IT DOES IS INFORM

BENEFICIARIES THAT THEY
HAVE LOST LIS AS OF

A CERTAIN DATE. NOW,
IF THE INDIVIDUAL IS

DEEMED, THAT DATE IS
GOING TO BE EFFECTIVE

THE FIRST OF THE YEAR,

THE FIRST OF
THE PLAN YEAR.

THAT'S BECAUSE THE
DEEMED PERIOD WILL END.

WHEN A DEEMED PERIOD IS
GIVEN TO AN INDIVIDUAL,

THEY RECEIVE--IT'S
TILL DECEMBER 31st OF

A GIVEN YEAR. APPLICANTS,
ON THE OTHER HAND,

YOU WILL SEE THE DATE
COME ACROSS ON THE TRR.

AND THAT'S BECAUSE WHEN
SOCIAL SECURITY AWARDS

LIS, IT'S AN OPEN ENDED
PERIOD UNTIL THEY

REDETERMINE THAT THE

PERSON EITHER LOST IT,

IS ELIGIBLE FOR A BETTER
OR WORSE--DEPENDING IF

THEY HAVE A
SUBSIDY-CHANGING EVENT,

OR SOMETHING LIKE THAT.

SO WHEN YOU RECEIVE
THAT, IT MEANS THAT

YOU'RE TELLING
THE INDIVIDUAL,

"YOU'RE LOSING LIS AS
OF" A DATE.

AND IT'S USUALLY
A FUTURE DATE.

AND IT CONTAINS
VARIABLE LANGUAGE

FOR DEEMS
AND INDIVIDUALS.

IT'S PRIMARILY SENT AT
THE END OF THE YEAR

AFTER THE RECEIPT OF
A LOSS OF SUBSIDY FILE,

WHICH IS SENT AS PART OF
THE RE-DEEMING PROCESS--

FOR DEEMED INDIVIDUALS,
I MEAN, ALTHOUGH THERE

CAN BE SOME APPLICANTS
WHO COULD LOSE IT

AT THE END OF THE YEAR
AT THE SAME TIME.

AND DURING THE YEAR,
YOU'RE USUALLY GOING

TO SEND THIS LETTER TO
LIS APPLICANTS WHO

LOSE IT DURING THE YEAR.
A LOT OF TIMES, USUALLY

WHEN SSA DOES SOME
RE-DETERMINATIONS, IT'S

USUALLY AROUND--
SOMETIMES THEY SEND

CHANGES AROUND APRIL.
IF A PERSON LOST IT,

SOMETIMES THERE ARE
CHANGES THAT YOU

DON'T HAVE TO SEND A
LETTER WHERE THE PERSON

WENT FROM, SAY, 50% TO
75% SUBSIDY OR WHATEVER.

BUT IF THEY LOST IT
ALTOGETHER, YOU WOULD.

USUALLY YOU'LL SEE
THOSE CHANGES

AROUND APRIL, ALTHOUGH
THEY CAN HAPPEN

DURING OTHER TIMES
OF THE YEAR,

SUCH AS IF SSA
RE-DETERMINES A PERSON,

IF THEY LOST A SPOUSE
OR HAD SOME CHANGE

IN INCOME OR SOMETHING
LIKE THAT.

SO THAT'S USUALLY WHEN YOU
SEND IT DURING THE YEAR.

THIS LETTER IS THE
LETTER THAT I NORMALLY

ATTACH TO THE ANNUAL
HPMS MEMO THAT COMES AT

THE END OF THE YEAR.
IT USUALLY COMES

AROUND DECEMBER 9, 10,

SOMEWHERE
IN THAT TIME FRAME.

AND THAT'S THE LETTER--

WHEN I SAY THE LOSS OF
SUBSIDY FILE IS COMING,

"THESE ARE THE PEOPLE
WHO ARE GOING TO LOSE

LIS AT THE END
OF THE YEAR,"

THIS IS THE LETTER
THAT'S

ATTACHED TO IT, OK?

OR THE LETTER THAT'S
REFERENCED.

THE APPENDIX "C" ON
THE OTHER HAND, IS

THE REMOVAL OF
LIS PERIOD.

AND THIS INFORMS
THE BENEFICIARY THAT

THEY LOST LIS FOR
A RETROACTIVE PERIOD,

BUT THEY STILL HAVE LIS.

IT DOESN'T CONTAIN
VARIABLE LANGUAGE

FOR DEEMED
AND APPLICANTS.

IT IS PRIMARILY SENT
DURING THE YEAR

TO DEEMED AND APPLICANT
INDIVIDUALS WHO MAY HAVE

HAD A RETROACTIVE
CHANGE.

AND IT'S IMPORTANT TO
MAKE SURE THAT

WHEN THIS LETTER
IS SENT, PLANS SHOULD

FOLLOW UP ON REFUNDS
AND RECOUPMENTS

FOR COST-SHARING BECAUSE
IT MEANS THAT A PERSON

MAY HAVE PAID
THE LIS CO-PAY OR HAD

A 100% PREMIUM SUBSIDY
OR SOMETHING LIKE THAT

AND THEY SHOULD NOT HAVE
HAD IT FOR THAT PERIOD.

SO TO GIVE AN EXAMPLE,
OK, SO WE'RE IN AUGUST.

LET'S SAY I'M
AN LIS PERSON

AND I LOST--I HAD
MY LIS PERIOD REMOVED.

I DON'T KNOW. MY STATEMENT
IN IT MADE A MISTAKE

OR SOMETHING. AND THIS
LETTER WILL BE SENT

TO ME.
LET'S SAY I LOST IT

IN THE MONTH
OF SEPTEMBER 2009.

I STILL HAVE LIS
AS OF APRIL 2010.

BUT FOR SEPTEMBER 2009
FOR SOME REASON, IT WAS

CHANGED. I LOST IT. AND
SO THIS IS THE LETTER

THAT YOU WOULD SEND.

SO THOSE ARE
THE DIFFERENCES.

USUALLY, YOU KNOW

YOU HAVE TO SEND

AN APPENDIX "C" WHEN
YOU SEE A TRC 223.

AND IT REMOVES A PERIOD

AND IT DOESN'T REPLACE
THE PERIOD.

AND I'M SURE YOUR
OPERATIONS FOLKS ARE

VERY FAMILIAR WITH THAT.

SO THOSE ARE THE TWO
DIFFERENCES.

AND IF YOU WERE TO SEE
THE LETTER,

THE LETTERS ARE VERY
SIMILAR IN LANGUAGE,

AND THAT'S WHY THERE'S
A LOT OF CONFUSION

RELATED TO IT.

AN ADDITIONAL QUESTION

TOWARDS THAT IS THAT,
SHOULD I SEND

A REMOVAL LETTER FOR
A FUTURE LIS PERIOD?

BECAUSE SOMETIMES ON THE
TRR, YOU WILL RECEIVE

A FUTURE PERIOD,
LIKE FOR A 1-1-2011

OR 1-1-2012 WITH
NO END DATE.

THIS IS BECAUSE
A PERSON WAS GIVEN--

THEY WERE
AN LIS APPLICANT,

AND LET'S SAY THEY HAVE
AN OPEN ENDED PERIOD

AND A PERSON BECOMES
DEEMED, FOR EXAMPLE--

USUALLY IT'S WHEN
THEY BECOME DEEMED.

AND SO THE FUTURE
PERIOD BECAUSE IT WAS

JUST OPEN ALL THE WAY TO
THE END OF TIME, I GUESS,

IT'S TELLING YOU

FROM THE DATE OF JANUARY
1, 2011, FORWARD,

REMOVE THAT PERIOD.
SO IN THOSE INSTANCES,

THEN, NO, YOU WOULDN'T
SEND A LETTER

TO A BENEFICIARY TELLING
THEM THAT, YOU KNOW,

"YOU LOST LIS FOR
THE NEXT 3 YEARS."

YOU KNOW, WE DON'T WANT
TO ALARM ANYONE.

BUT FOR THOSE
FUTURE PERIODS, YOU

DON'T HAVE TO SEND IT.

PRIMARILY APPENDIX "C"
IS MEANT FOR

RETROACTIVE PERIODS.

AND SO THE REMOVAL
LETTER IS NOT NECESSARY

IN THIS CASE.

AS FAR AS THE LIS RIDER,
PREVIOUSLY WE'D

START LOOKING AT
BENEFICIARIES

IN THE CASE OF
DEEMED BENEFICIARIES,

AND DEEMED BENEFICIARIES
ARE THOSE INDIVIDUALS

WHO AUTOMATICALLY
QUALIFY FOR LIS.

WE START LOOKING AT
THEIR ELIGIBILITY

TO QUALIFY FOR
THE UPCOMING PLAN YEAR

STARTING IN JULY.

AND SO WHAT USED TO
HAPPEN WAS THAT

WE USED TO NOT SEND YOU
THE INFORMATION THAT

AN INDIVIDUAL WAS DEEMED
FOR--IN THIS CASE 2011--

UNTIL LATE NOVEMBER. BUT
ONCE WE STARTED PUTTING

THE INFORMATION ON THE
TRR, WE STARTED SENDING

THAT INFORMATION ON THE
TRR. SO A LOT OF PLANS

WERE CONFUSED BECAUSE
THEY WERE SAYING,

YOU KNOW,
"WHAT SHOULD I DO?"

YOU KNOW, THE PERSON
BECOMES LIS ELIGIBLE

FOR JANUARY 1, 2011.

"WE DON'T HAVE

OUR NEW BENEFIT
STRUCTURE IN PLACE."

YOU KNOW, "AM I SUPPOSED
TO SEND AN LIS RIDER?"

AND THE ANSWER TO
THAT QUESTION--BECAUSE I

GET THAT QUESTION A LOT,

ESPECIALLY STARTING
IN JULY--IS THAT

IN SECTION 70.2 OF
CHAPTER 13,

UNDER MEMBER
NOTIFICATIONS,

FIRST WHEN YOU
RECEIVE A CHANGE

ABOUT A BENEFICIARY
OBTAINING LIS,

YOU SHOULD SEND IT
WITHIN 30 DAYS

OF RECEIVING SYSTEM
NOTIFICATION FROM THE TRR.

BUT THE QUESTION IS
ABOUT, YOU KNOW,

"WE DON'T HAVE OUR NEW
BENEFIT PACKAGE NOTICE."

AND WHAT IT SAYS
SPECIFICALLY

IN THAT SECTION IS THAT
"WHEN NOTIFICATIONS ARE

"RECEIVED STARTING IN
JULY, THAT AN INDIVIDUAL

"IS RE-DEEMED FOR THE
FOLLOWING CALENDAR YEAR,

"THE LIS RIDER CONVEYING
THAT INFORMATION DOES

"NOT NEED TO BE SENT

UNTIL THE COMBINED
ANOC/EOC,"

WHICH IS NORMALLY SENT
OCTOBER 31, RIGHT?

IT SHOULD BE OUT BY
OCTOBER 31.

SO IF YOU RECEIVE
A NOTIFICATION

"THE BENEFICIARY IS
DEEMED FOR NEXT YEAR,"

YOU DON'T HAVE TO SEND
THAT LIS RIDER

UNTIL YOU'RE EITHER
ABOUT TO SEND

THE ANOC/EOC.
IF YOU'VE ALREADY SENT

YOUR ANOC/EOC, AND IT'S,
YOU KNOW, NOVEMBER 1,

NOVEMBER 2, THAT SORT
OF THING, AND A PERSON

GETS RE-DEEMED FOR
THE FOLLOWING YEAR,

THEN YOU HAVE 30 DAYS
TO SEND.

SO THAT'S A FREQUENT
QUESTION THAT I GET

AROUND UPCOMING TIMES.
SO YOU SHOULD REVIEW

SECTION 70.2
IN CHAPTER 13.

SO I KNOW I'VE REFERENCED
A NUMBER OF MODEL LETTERS

AND GUIDANCES
AND RESOURCES

RELATED TO LIS, AND JUST
AS A RECAP, LIKE I SAID,

CHAPTER 13 WILL USUALLY
ANSWER MOST OF THE QUESTIONS

THAT YOU HAVE.

FOR THE LIS RIDER
QUESTIONS, YOU SHOULD

LOOK IN THE MARKETING
GUIDELINES,

ALTHOUGH, LIKE I SAID,
SECTION 70.2 DOES HAVE

INFORMATION ABOUT
SENDING

THE LIS RIDER AS WELL.

AS FAR AS SOME OF
THE LIS IMPROVEMENTS

THAT I TALKED ABOUT--
PUTTING THE LIS DATA

ON THE TRANSACTION
REPLY REPORT, YOU SHOULD

REFER TO THE SOFTWARE
RELEASE MEMO DATED

JANUARY 7, 2009 AND/OR,

BECAUSE IT'S ACTUALLY
THE SAME INFORMATION,

APRIL 10, 2009. IT WAS
ACTUALLY IMPLEMENTED

IN JULY OF 2009. IT WAS
ORIGINALLY SUPPOSED TO

BE IMPLEMENTED IN APRIL
OF 2009, BUT WE PUSHED

IT BACK BECAUSE
IT WAS A HUGE CHANGE.

THE LIS HISTORY REPORT
CHANGES WERE REPORTED

IN THE SOFTWARE
RELEASE MEMO

DATED AUGUST 12, 2009.

AND IN THAT, IT TALKS
ABOUT THE FIELDS THAT WE

MODIFIED, HOW WE
CALCULATE THOSE FIELDS,

AND THE USE
OF THE LIS REPORT.

AS FAR AS BEST
AVAILABLE EVIDENCE,

AS FAR AS POLICY,
THE MOST RECENT ONE IS

AUGUST 4, 2008.
AND UPDATING CMS SYSTEMS

FOR DEEMED
INDIVIDUALS IS

MAY 11, 2009. THERE'S
A YEARLY RE-DEEMING MEMO

THAT I REFERENCED
THAT THE APPENDIX "B"

WILL BE IN.
IT'S NORMALLY SENT

DURING THE RE-DEEMING
SEASON,

WHICH IS LATE AUGUST

AND LATE NOVEMBER
OR EARLY DECEMBER.

AND THOSE ARE THE DATES
FOR LAST YEAR.

AND FOR REIMBURSING
INDIVIDUALS WHEN YOU

REMOVE THEIR LIS PERIOD,
YOU SHOULD REFER TO

SECTION 70.3.4
OF CHAPTER 13.

AND THAT'S ALL I HAVE.

AND I CAN TAKE
QUESTIONS.

HI. I'M STEVE PEARSE
WITH FAMILY CARE.

WE HAVE A PROBLEM IN
OREGON--

WELL, IT MIGHT BE ALL OVER,
BUT I HAVE A PROBLEM IN OREGON

WHERE WE HAVE
A FULL DUAL PLAN

AND PEOPLE GET PUT IN
THE WRONG LIS CATEGORY.

IF THEY'RE A FULL DUAL,
THEY CAN'T BE A FULL DUAL--

AND BE--I THINK IT'S LEVEL 4
WHERE THEY HAVE 25%, 50% LIS.

AND SO WE'RE NOT SURE HOW
TO FIX THOSE.

IS IT SOMETHING
SOCIAL SECURITY HAS TO FIX?

AND THESE ARE PEOPLE THAT
WERE DEEMED, I BELIEVE.

WELL, IN CASES LIKE THAT,
I THINK THAT HAS MORE TO DO

WITH WHAT THE INFORMATION
THE STATE IS SENDING US.

AND THE WAY TO FIX IT,
ACTUALLY, WOULD BE

FOR US TO CONTACT
THE STATE

FOR THEM TO CORRECT
IT ON THEIR FILE.

AND THEN THEY CAN ALWAYS
RESEND IT AND WE CAN

UPDATE THAT INFORMATION.

WE DO HAVE A CONTACT
AT CMS THAT, YOU KNOW,

WORKS WITH
THE STATE CONTACTS.

YOU KNOW, IF YOU WERE TO
PROVIDE EXAMPLES

OF THOSE INDIVIDUALS,
OR IF YOU HAVE

A STATE CONTACT, IT REALLY
HAS TO BE CORRECTED

AT THE STATE LEVEL FOR
INFORMATION FOR THEM

TO SEND TO US.

THANKS.
OK.

HELLO? IS IT ON?

THERE WE GO.

PERFECT. MICHELLE JUHANSON,
PerformRX.

I HAVE A QUESTION ABOUT
A PROVISION IN CMS 4085

THAT SAYS THAT--AND
I'M PARAPHRASING--

BUT THAT YOU HAVE TO ISSUE
THE REIMBURSEMENT

OR THE RECOUPMENT NOTICE
WITHIN 45 DAYS

OF BEING NOTIFIED OF A
MEMBER'S LIS STATUS CHANGING.

NOW, DOES THAT MEAN WITHIN
45 DAYS OF CMS NOTIFYING

THE PLAN ON THE TRR
OR WITHIN 45 DAYS

OF THE PHARMACY NOTIFYING
THE PLAN THAT THEY'RE

CARRYING A BALANCE,
OR IS IT WITHIN 45 DAYS

OF THE MEMBER SUBMITTING
THE BEST AVAILABLE EVIDENCE?

WOW.

Woman: IT'S ALWAYS GOOD WHEN
THERE ARE GOOD QUESTIONS.

RIGHT.

UM, I WOULD NEED TO LOOK
AT THE GUIDANCE--

BECAUSE NORMALLY THE
GUIDANCE WILL TELL YOU

WITHIN 45 DAYS OF, LIKE,
"SYSTEMS NOTIFICATION."

IT WILL SAY THAT.
WITHOUT LOOKING AT

THE GUIDANCE
SPECIFICALLY,

I WOULDN'T BE ABLE TO
ANSWER IT DIRECTLY,

YOU KNOW. MY INITIAL
REACTION, THOUGH, IS

PROBABLY WITHIN 45 DAYS
OF THE NOTIFICATION

BECAUSE YOU WANT TO
SEND THE LETTER...

RIGHT.

AND SO IT SEEMS THAT YOU
WILL FOLLOW UP ON THAT.

BUT LIKE I SAID, WITHOUT
LOOKING SPECIFICALLY

AT WHAT
THE SECTION SAYS,

I DON'T WANT TO
SPECULATE, YOU KNOW.

NO PROBLEM.
THANK YOU.

WE'VE OFTEN FOUND
THAT THE TRR

AND THE LIS HISTORY,

THE DATES DON'T MATCH.
THEY CONTRADICT EACH OTHER.

I GUESS MY CONCERN IS IF
THE ACUMEN IS BASED

OFF OF THE HISTORY AND
THE TRR ISN'T MATCHING,

CAN YOU GIVE SOME INSIGHT
AS TO WHY IT'S BASED OFF

OF THE HISTORY REPORT?

WELL, BEFORE I ANSWER
THAT, THE REASON WHY

IT'S DIFFERENT IS
BECAUSE WHAT HAPPENS ON

THE TRR IS--AND I DIDN'T
THINK THAT I WAS GOING

TO GET INTO THIS LEVEL
OF DETAIL, SO HA HA!

I ACTUALLY CUT THOSE
SLIDES OUT BECAUSE

I THOUGHT IT WAS TOO
MUCH--BUT WHAT HAPPENS

IS THAT THE INFORMATION
THAT WE REPORT

FOR THE LIS START DATE,
WE EITHER REPORT

THE LIS START DATE
OR THE DATE THAT THEY

ENROLLED IN YOUR PBP.
SO WHICHEVER IS SOONER.

SO LET'S SAY A PERSON
ENROLLED IN YOUR PLAN

JANUARY 1, 2010. BUT
THEY DIDN'T START LIS

UNTIL FEBRUARY 1, 2010.

THEY'RE
GOING TO GIVE YOU

THE FEBRUARY 1, 2010,
DATE ON THE TRR BECAUSE

THAT'S THE DATE THEY
HAD LIS.

NOW, LET'S SAY
THE PERSON ENROLLED IN

YOUR PLAN
JANUARY 1, 2010,

BUT THEY HAD LIS FROM
SEPTEMBER 1, 2009.

WE'RE GOING TO GIVE YOU

THE JANUARY 1, 2010
DATE.

AND THE REASON WHY IS
BECAUSE WHAT LIS

THEY HAD PRIOR TO
ENROLLING IN YOUR PLAN

WE DECIDED REALLY WAS OF
NO CONSEQUENCE TO YOU

BECAUSE IT DIDN'T AFFECT
YOUR COST-SHARING.

THE INFORMATION THAT YOU
WANTED TO KNOW WAS

WHEN THE PERSON ENROLLS
IN YOUR PLAN,

DID THEY OR DID THEY
NOT HAVE LIS?

SO ON THE LIS
HISTORY REPORT,

THE LIS START DATE IS
THE ACTUAL DATE.

SO WHAT YOU'RE
GOING TO GET IS

THAT SEPTEMBER 1st DATE.

SO THAT'S THE REASON WHY

IT CHANGES. AND THAT'S
WHAT I MEANT ABOUT WE'RE

STILL LOOKING AT IT
TO SAY,

"OK, IS THIS CONFUSING?"

I ACTUALLY HAVE
A COUPLE QUESTIONS."

AND I HAD A CONFERENCE
CALL WITH ACUMEN

EARLIER THIS WEEK--OR
LATE LAST WEEK BECAUSE

THERE STILL ARE SOME
QUESTIONS TO MAKE SURE

THAT THE PLANS AREN'T
BEING DEEMED

BEFORE, YOU KNOW, DATA
DISCREPANCIES LIKE THAT.

AND THAT'S WHY WE
HAVEN'T MADE ANY CHANGES

TO SOME OF THE OTHER
REPORTS BECAUSE WE'RE

STILL LOOKING AT
THE LIS HISTORY REPORT.

WE JUST DISCOVERED
ANOTHER SORT OF ISSUE.

SO ACUMEN IS AWARE
OF THAT INFORMATION.

AND THAT'S
THE REASON WHY.

DOES THAT ANSWER
YOUR QUESTION?

YES, IT DOES. IF I COULD
JUST MAKE A RECOMMENDATION,

I THINK--AND JUST--
TO ELIMINATE CONFUSION.

IT MIGHT BE HELPFUL BECAUSE
YOU HAVE DOCUMENTATION

THAT SAYS WE'RE NOT TO USE
THE--EFFECTIVE DATE...

PRIOR TO THE EFFECTIVE
DATE ON THE PLAN,

IF WE CAN JUST--IF IT'S
JUST THE LIS HISTORY,

AND WE KNOW IF THE MEMBER
STARTS WITH US JANUARY 1, 2010,

BUT THEY HAD LIS IN '09,

OUR RECORDS WILL REFLECT
THEIR INFORMATION BASED ON

OUR EFFECTIVE DATE.

AND JUST HAVE IT CONSISTENT
ACROSS THE BOARD.

JUST A RECOMMENDATION.
THANK YOU.

LIKE I SAID, WE'RE STILL
UNCOVERING A LOT.

SO THANK YOU.