

CMS 2010 Regional PACE Conference

An Overview of PACE Part D Elements

- Confirmation of enrollment for members of employer/union group receiving employer subsidy
 - *The Part D sponsor must meet CMS requirements for obtaining a confirmation of the intent to enroll from any individual who attempts to enroll in the Part D plan, but whose enrollment is conditionally rejected by CMS due to a detected match indicating that the beneficiary may have existing employer or union drug coverage.*
 - *For PDP Only: PDP Guidance Eligibility, Enrollment and Disenrollment*
 - *For MA-PD Only: Medicare Managed Care Manual Chapter 2*
 - *Prescription Drug Manual: Chapter 3*

- USE OF SSN/HICN

- *The Part D sponsor must use a number other than an enrollee's Social Security Number (SSN) or Healthcare Insurance Claim Number (HICN) on enrollee identification cards.*
- PDP Solicitation; MA-PD Solicitation

CB01

- Collecting and Updating Enrollees' Other Health Insurance (OHI) Information
 - *The Part D sponsor must have a system for collecting and updating information from enrollees about their other health insurance, including whether such insurance covers outpatient prescription drugs, and must report that information to the Coordination of Benefits (COB) Contractor.*
 - PDP Solicitation; MA-PD Solicitation; Medicare Prescription Drug Benefit Manual, Chapter 14-Coordination of Benefits

CBo3

- TrOOP Status at Disenrollment

- *The Part D plan sponsor must provide the beneficiary's gross covered drug spend and true out-of-pocket (TrOOP) balance to the beneficiary as of the effective date of disenrollment, and if the disenrollment is due to a mid-year plan change, provides a report of these beneficiary data to the new plan of record.*
- PDP Solicitation; MA-PD Solicitation
- CFR 423.104, 423.464
- Prescription Drug Manual: Chapter 14
- PACE Plan Addendum: Implementation Guidance for Automated TrOOP Balance Transfer Process

CPo6

- Internal Monitoring and Auditing Procedures

- *The Part D sponsor must have and implement a compliance plan that includes procedures for effective internal monitoring and auditing.*
- 42 CFR § 423.504(b)(4)(vi)(F); PDP Solicitation, MA-PD Solicitation
- Prescription Drug Manual: Chapter 9

- Response to Detected Offenses and Corrective Action plan

- *The Part D sponsor must have and implement a compliance plan that includes procedures to ensure a prompt response to detected offenses relating to the organization's contract as a Part D sponsor, and must conduct a timely, reasonable inquiry upon discovery of evidence of misconduct related to payment or delivery of prescription drug items or services under the contract. The Part D sponsor must also develop and conduct appropriate corrective actions in response to identified violations.*
- 42 CFR § 423.504(b)(4)(vi)(G); PDP Solicitation; MA-PD Solicitation
- Prescription Drug Manual: Chapter 9

CPo8

- Comprehensive Fraud and Abuse Plan

- *The Part D sponsor must have and implement a compliance plan that includes a comprehensive plan to detect, correct, and prevent fraud, waste and abuse.*
- 42 CFR § 423.504(b)(4)(vi)(H); PDP Solicitation; MA-PD Solicitation; Prescription Drug Benefit Manual: Chapter 9 – Part D Program to Control Fraud, Waste and Abuse
- Prescription Drug Manual: Chapter 9

CLo2

- Data Elements Needed to Link Medicare Parts A, B & D Data
 - *The Part D sponsor must submit claims data that can be linked at the individual level to Medicare Parts A & B data.*
 - 42 CFR § 423.329(b)(3)(i); § 422.310; Instructions: Requirements for Submitting Prescription Drug Event Data

CLo3

- ◆ Processing systems

- *The Part D sponsor has a detailed claims adjudication process including flow charts, claims management, data capture, and claims data retrieval processes.*
- PDP Solicitation; MA-PD Solicitation

PA01

- Certification of Monthly Enrollment and Payment Data Relating to CMS Payment

- *Payments to a Part D sponsor are conditioned upon its submittal and certification of enrollment, disenrollment, and change transactions to CMS each month. The Part D sponsor must submit reconciled enrollment/payment reports and signed attestation forms to CMS within 45 days of data availability.*
- 42 CFR § 423.505(k)(2); PDP Solicitation; MA-PD Solicitation
- MARx Calendar and Plan Monthly Schedule
- <http://www.cms.gov/mapdhelpdesk/>

PPo1

- Written Policies and Procedures

- *The Part D sponsor must adhere to CMS guidance for adopting and maintaining current, written policies and procedures that address all applicable Part D statutes, regulations, and program requirements. These policies and procedures must articulate the specific procedures personnel should follow when performing duties.*
- 42 CFR § 423.504(b)(4)(vi)(A)