



# Options for Adjusting Star Ratings for Audits and Enforcement Actions: Listening Session



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# Today's Listening Session

- Objective
  - Re-evaluate the appropriate connection between sanctions, audits, and civil money penalties (CMPs) and the Star Ratings
    - Encourage early feedback on adjustments for 2018 Star Ratings
  - Describe changes to Medicare Plan Finder display of sanctioned plans

# Background

- Previously, CMS reduced highest Star Rating for contracts under enrollment sanction (policy suspended March 2016)
- The Beneficiary Access and Performance Problems (BAPP) Star Ratings measure is based on sanctions, CMPs, and Compliance Activity Module (CAM) data

# Star Ratings Program Policy Goals

- Measure multiple aspects of quality
- Maintain a reliable methodology for the Star Ratings program
- Provide information on quality to facilitate consumer choice
- Use valid quality ratings as the basis of Quality Bonus Payments

## Policy Goals (cont.)

- Drive quality improvements by MA and Part D sponsors
- Continuously review the methodology for enhancements
- Provide information that is a true reflection of both the MA and Part D sponsor's performance and the experience of the enrollees



# Policy Goals for Adjusting for Audits/Enforcement Actions

Reflect data-driven adjustments corresponding to magnitude of issue

Reflect the key audit findings, if applicable

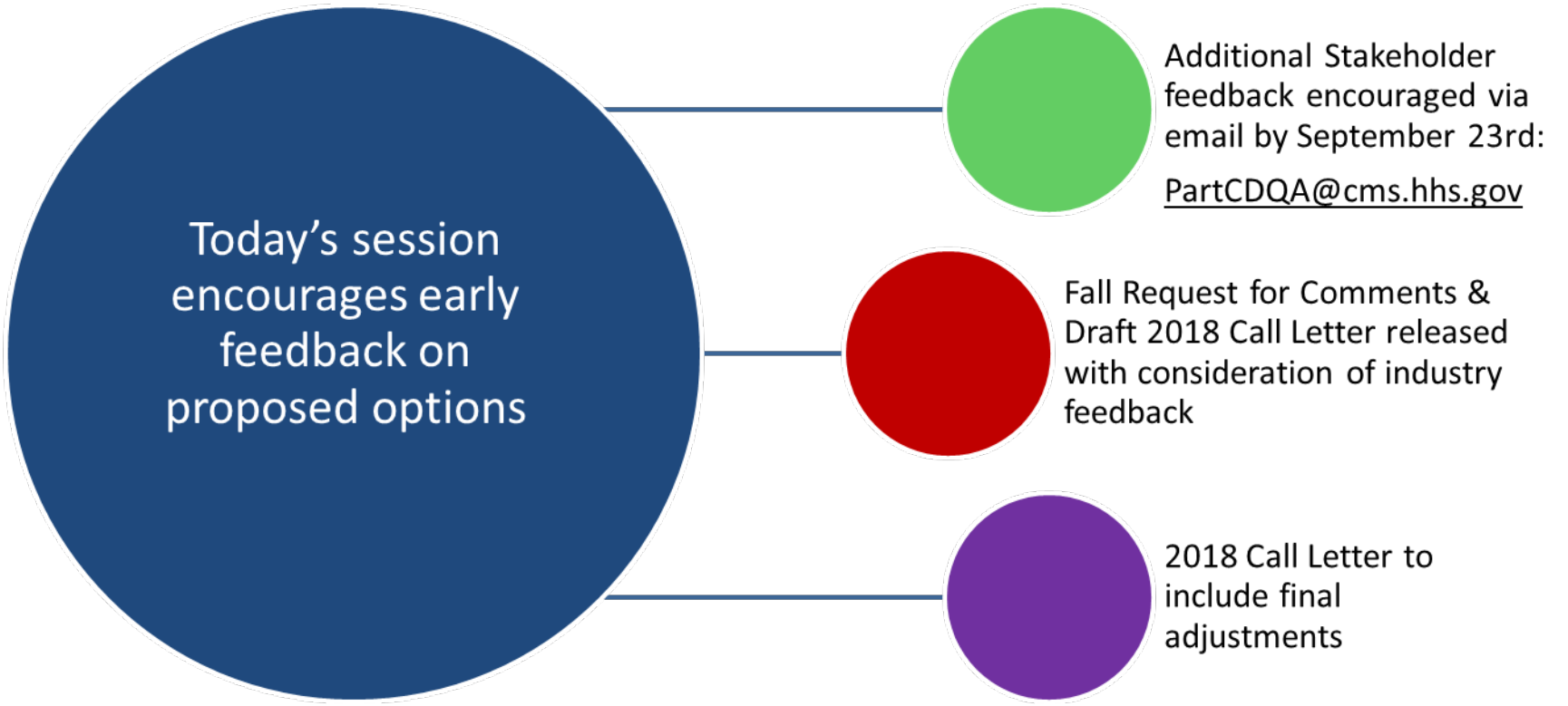
Adjust appropriately, regardless of the source of enforcement action

Provide transparency to sponsors and consumers

# Industry Options

- Reinstate reduction to sanctioned contracts' overall Star Ratings
  - Deduct a value versus automatic downgrade to 2.5 stars
- Develop an audit measure for Star Ratings
  - Use audits conducted in past few years
- Revise the current BAPP measure to reflect the varying sizes of CMPs
  - Reflect the issues identified as well as contract enrollment

# Next Steps



Today's session encourages early feedback on proposed options

Additional Stakeholder feedback encouraged via email by September 23rd:  
[PartCDQA@cms.hhs.gov](mailto:PartCDQA@cms.hhs.gov)

Fall Request for Comments & Draft 2018 Call Letter released with consideration of industry feedback

2018 Call Letter to include final adjustments



# Today: Only Current Enrollees Can View a Sanctioned Plan on the Medicare Plan Finder

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Your Current Plan(s)

Test Plan 2 (AB) (Cost) (Hxxxx-xxx-x)

Organization: Test Organization

Estimated Annual Drug Costs: [?]	Monthly Premium: [?]	Deductibles [?] and Drug Copay [?] / Coinsurance: [?]	Health Benefits: [?]	Drug Coverage [?] , Drug Restrictions [?] and Other Programs:	Estimated Annual Health and Drug Costs: [?]	Overall Star Rating: [?]	
<b>Retail</b>  Pharmacy Status: Standard Cost-Sharing  Cost as of Today: \$216  <b>Mail Order</b> Cost as of Today: \$196	\$49.00  Drug: \$49.00 Health: \$0.00  <b>Part B Premium [?] : No</b>	Annual Drug Deductible: \$0  Health Plan Deductible: \$0  Drug Copay/Coinsurance: \$5 - \$85, 33%	Doctor Choice: Plan Doctors Only (some exceptions)  Out of Pocket Spending Limit: \$3,400 In-network  <div>V H</div>	All Your Drugs on Formulary: <b>Yes</b>  Drug Restrictions: <b>Yes</b>  <b>Lower Your Drug Costs</b>  <b>MTM Program [?] : Yes</b>	\$3,650	<div>★</div> This plan got <b>Medicare's highest rating</b> (5 stars)	<div>Enroll</div>

Compare Plans

+

Medicare Health Plans without Drug Coverage

Star Ratings

# Updates to Medicare Plan Finder Plan Results Page



Effective October 1, 2016:

- Users not currently enrolled in a sanctioned plan will be able to view sanctioned plans on Medicare Plan Finder
- A Sanctioned Plan button will be displayed which users can click to see more information about the specific sanction

# Suppression of Sanctioned Plan's Data and Enrollment Button

- Beneficiaries who are not enrolled in a sanctioned plan will not be able to
  - Select a sanctioned plan for comparison purposes;
  - View pricing-related information (e.g., premiums, copayments) for a sanctioned plan; or
  - View the sanctioned plan's overall Star Rating
- **NOTE:** CMS will continue to display the pricing-related information for current enrollees of a sanctioned plan under *Your Current Plan(s)*

# Updated Plan Results Page for Non-Enrollees

Medicare Health Plans with Drug Coverage							Star Ratings
Test Plan 2 (AB) (Cost) (Hxxxx-xxx-x)							
Organization: Test Organization							
Estimated Annual Drug Costs: [?]	Monthly Premium: [?]	Deductibles [?] and Drug Copay [?] / Coinsurance: [?]	Health Benefits: [?]	Drug Coverage [?], Drug Restrictions [?] and Other Programs:	Estimated Annual Health and Drug Costs: [?]	Overall Star Rating: [?]	
<b>Retail</b> Annual: Information Not Available  <b>Mail Order</b> Annual: Information Not Available	Information Not Available  <b>Part B Premium [?]:</b> No	Annual Drug Deductible: Information Not Available  Health Plan Deductible: Information Not Available  Drug Copay/Coinsurance: Information Not Available	Doctor Choice: Information Not Available  Out of Pocket Spending Limit: Information Not Available   	All Your Drugs on Formulary: Information Not Available  Drug Restrictions: Information Not Available  <b>MTM Program [?]:</b> Yes	Information Not Available	Information Not Available	<div>Sanctioned Plan</div> <div>Sanctioned Plan: Click for More Information</div>
<div>Compare Plans </div>							

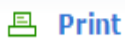
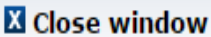
# Sanctioned Plan Button

- A new pop-up window will open when the user clicks on the Sanctioned Plan button
- Information on the new page will
  - Explain that the plan is under sanction for violating Medicare rules and cannot accept enrollments; and
  - Provide a link to CMS' Sanction Notice sent to the sponsor

# Sanctioned Plan Button Pop-Up Display




The Official U.S. Government Site for Medicare



## *Suppressed Plan Information*

This plan isn't allowed to enroll new members because of serious violations to Medicare Rules. Until Test Organization 1 fixes the problems, people with Medicare may not enroll into this plan.

[Read this notice for more information](#)



# Updated Plan Details Star Ratings Tab

OverviewHealth Plan BenefitsDrug Costs & CoverageStar RatingsManage Drugs

Test Plan 2 (AB) (Cost)  
(Hxxxx-xxx-x)

Organization: Test Organization

Plan Type: Preferred Provider Organization

D

V

500 West Main Street  
Louisville, KY 40202

Members:  
1-800-457-4708  
711 (TTY/TDD)

Non Members:  
1-800-833-2364  
711 (TTY/TDD)

Overall Star Rating: [?]

Information not Available

Sanctioned Plan

Sanctioned Plan: Click for More Information

Information on quality can help you compare Medicare plans. Higher quality means better care and value. Looking at this plan's star rating tells you how well the plan performs overall and in different categories. Medicare measures how well health and prescription drug plans perform.

[Learn More About Star Ratings](#)

[View Star Details](#)[Hide All Measures](#)

Star Ratings

★★★★★	Excellent
★★★★☆	Above Average
★★★☆☆	Average
★★☆☆☆	Below Average
★☆☆☆☆	Poor

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# Updated Plan Details Star Ratings Tab (cont.)

Overall Star Rating [?]	
Information not Available	
[-] Prescription Drug Plan Star Ratings	
<b>Summary Rating of Prescription Drug Plan Quality (?)</b>	★★★★½ 4.5 out of 5 stars
<b>+ Drug Plan Customer Service (?)</b> <a href="#">View data sources</a>	★★★★★ 5 out of 5 stars
<b>+ Member Complaints and Changes in the Drug Plan's Performance (?)</b> <a href="#">View data sources</a>	★★★★ 4 out of 5 stars
<b>+ Member Experience with the Drug Plan (?)</b> <a href="#">View data sources</a>	★★★★ 4 out of 5 stars
<b>+ Drug Safety and Accuracy of Drug Pricing (?)</b> <a href="#">View data sources</a>	★★★★ 4 out of 5 stars
[-] Health Plan Star Ratings	
<b>Summary Rating of Health Plan Quality (?)</b>	★★★★½ 3.5 out of 5 stars
<b>+ Staying Healthy: Screenings, Tests and Vaccines (?)</b> <a href="#">View data sources</a>	★★★ 3 out of 5 stars



# Important Dates

Date	Activity
September 9-19, 2016	2017 Star Ratings Second Plan Preview Period. Plans preview their data and star assignments in HPMS; alert CMS of any questions or data issues: <a href="mailto:PartCandDStarRatings@cms.hhs.gov">PartCandDStarRatings@cms.hhs.gov</a>
September 23, 2016	Email feedback on options for 2018 Star Ratings adjustments for audits and enforcement actions: <a href="mailto:PartCDQA@cms.hhs.gov">PartCDQA@cms.hhs.gov</a>
October 12, 2016	2017 Star Ratings Go Live
Fall 2016	2018 Star Ratings Request for Comments

# **Feedback and Ideas Welcome**