

Part D Point of Sale Pilot



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Improvements to the Part D Exceptions and Appeals Processes

- Ongoing commitment to making the Part D coverage determination and appeals processes more accessible and understandable to beneficiaries
- 2016 Call Letter identified specific areas CMS will explore:
 - Improvements to information provided to beneficiaries when drugs are not covered by Part D and the issue is not resolved at the Point of Sale (POS)
 - Options for resolving certain POS claim rejections without the beneficiary having to request a coverage determination from the plan

Current Part D POS Process

- When an enrollee's prescription cannot be filled as written and the issue cannot be resolved at the POS, the network pharmacy is required to deliver a copy of the CMS standardized pharmacy notice to the enrollee
- The pharmacy notice:
 - Instructs enrollee to contact their plan for additional information
 - Explains the enrollee's right to receive a coverage determination from their plan, including a decision on an exception to a plan coverage rule such as step therapy or prior authorization

POS Pilot

- CMS will work with Part D plans and PBMs to identify and test proactive approaches to resolving POS issues for certain Part D drugs without requiring the enrollee to take additional action
- CMS' goal is to partner with our Part D plans and PBMs to determine potential policy changes
- Will include a mix of plans and PBMs representing large and small entities, as well as stand-alone PDP and MA-PD coordinated care plans

POS Pilot (cont.)

- CMS is soliciting participation and expects pilot testing to begin in 2015
- We envision multiple phases for the pilot:
 - Identifying and developing potential POS process improvements
 - Testing new approaches
 - Analyzing results and identifying next steps

Identifying and Developing Process Improvements

Pilot creates an opportunity for Part D plans and PBMs to develop innovative proactive approaches. Participants will:

- Test various approaches to improve the current POS process (e.g., outreach to prescribers or enrollees)
- Identify potential operational constraints and resource limitations and explore possible solutions
- Identify existing effective processes to resolve certain types of issues at the POS and how to ensure they remain in place going forward
- Share information with CMS through data reporting and feedback sessions

Testing New Approaches

Once identified, pilot participants will test their new POS processes. During testing phase, participants will:

- Have ongoing conversations with CMS
- Continue to identify improvements, as well as obstacles and limitations and any potential or demonstrated resolutions
- Continue data sharing

Analyzing Results

Following completion of pilot testing

- Participants will:
 - Share written results
 - Identify lessons learned
 - Identify areas of potential improvement
- CMS will:
 - Analyze results from all participants and determine potential policy changes
 - Share pilot results publicly
 - Solicit input from stakeholders on potential policy changes

Next Steps

- Contact CMS to participate in the pilot
- CMS will also reach out to potential participants
- Share current best practices you have implemented and how those approaches have improved outcomes for your beneficiaries

Questions?

To volunteer for the pilot or ask questions, use the Part D appeals mailbox. Please include “**POS PILOT**” in the subject line of your message.

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