



CMS 2012 Tri-Regional PACE Conference

Part D Break-Out Session

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- 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.*
 - Note: POs may contact the participant in writing or by phone. If written contact is used, POs must use a CMS-approved notice (see CMS-issued model notice, PDP Model Notice to Individuals Identified on CMS Records as Members of Employer Group/Union Receiving Employer Subsidy—Exhibit 5 in the Enrollment Guidance, PDP Model Notice to Potential Auto-Enrollee with RDS—Exhibit 5a in the Enrollment Guidance, or Model Notice for MA-PD Plans for Individuals Identified on CMS Records As Members of Employer Group Receiving Subsidy—Exhibit 6b in Medicare Managed Care Manual).
 - *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

- 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

- 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

- 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

- 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

- 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/>
 - Please review the SOP and MARX Calendar on Reed and Associates Website

- 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)