

DEPARTMENT OF HEALTH & HUMAN SERVICES  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard  
Baltimore, Maryland 21244-1850



**CENTER FOR MEDICARE**

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**DATE:** January 16, 2019  
**TO:** All Part D Plan Sponsors  
**FROM:** Jennifer R. Shapiro, Acting Director, Medicare Plan Payment Group  
**SUBJECT:** Completion of the Reopening of the 2013 Final Part D Payment Reconciliation

CMS completed the calculations for the reopening of the 2013 Final Part D Payment Reconciliation, and any payment adjustments stemming from the results of these calculations will be reflected in the March 2019 payment. The calculations were performed in accordance with § 1860D-14 and § 1860D-15 of the Social Security Act and associated regulations and guidance. The reconciliation calculations utilize all accepted data as follows:

- Prescription Drug Event (PDE) data with a processed date, found on the Prescription Drug Front-end System (PDFS) response report, on or before 20180930 Cycle 3;
- All prospective payments made for Part D net of all adjustments processed through the January 2019 payment; and
- Direct and Indirect Remuneration (DIR) information received in the Health Plan Management System (HPMS) by September 24, 2018.

Sponsors will receive payment reconciliation reports, as well as the Part D Exclusion from Reconciliation Report. The Part D Exclusion from Reconciliation Report was described in the January 6, 2014 HPMS memorandum, "Reconciliation PDE Exclusion Process" and the April 16, 2014 HPMS memorandum, "Updates to the Reconciliation PDE Exclusion Process." The report identifies PDEs that were excluded from the reopening of the 2013 Part D payment reconciliation.

The payment reconciliation reports for reopening will be available in your reconciliation mailboxes at the Customer Service and Support Center (CSSC) on Thursday, January 17, 2019. If you cannot access these reports, please contact CSSC at 877-534-2772.

Payment adjustments to remit and recover these calculated reconciliation amounts are planned for the March 2019 payment. Payment is contingent on receipt of the "Attestation of Data Relating to CMS Payment to a Medicare Part D Sponsor," which was due by November 6, 2018. See the October 30, 2018 HPMS memorandum, "Attestation of Prescription Drug Event (PDE) Data and Direct and Indirect Remuneration (DIR) Data related to the 2013 Reopening." If the attestation has not been received, the payment adjustment will not occur in the March 2019

payment. The payment adjustment will occur after the attestation is received.

All reopening requests received after the 2013 Part D payment reconciliation and prior to the 2013 reopening are now considered to be closed. If, upon review of the 2013 reopening results, a sponsor feels that there is new information for CMS to consider, then a sponsor can submit a reopening request.

### *Reopening Process*

CMS, at its discretion, may reopen final payment determinations. Part D sponsors can submit requests for reopening, as instructed in the December 29, 2015 HPMS memorandum, “Revised Reopening Request Process and Notification of Overpayment Related to PDE and DIR Data.”

Any questions regarding the reopening process may be sent to the Reconciliation Support Contractor, Pacific Consulting Group (PCG), at [PartDPaymentSupport@acumenllc.com](mailto:PartDPaymentSupport@acumenllc.com).

### *Appeals Process*

Appeals are filed when a Part D sponsor does not believe that CMS applied its stated payment methodology correctly. Refer to 42 C.F.R. § 423.350 and the May 8, 2008 HPMS memorandum, “The Part D Reopenings Process and the Part D Appeals Process.”<sup>1</sup> Note that the contact information in the May 8<sup>th</sup> memorandum has changed and is reflected below.

If you wish to appeal, your request for reconsideration must be filed and received by Friday, February 1, 2019. Requests for reconsideration should be addressed to Jennifer R. Shapiro, Acting Director, Medicare Plan Payment Group, and emailed to the Reconciliation Support Contractor at [PartDPaymentSupport@acumenllc.com](mailto:PartDPaymentSupport@acumenllc.com).

If you intend to mail your request for reconsideration, submit the request to the Reconciliation Support Contractor at the following address:

Pacific Consulting Group  
Attn: Part D Payment Support  
643 Bair Island Road, Suite 212  
Redwood City, CA 94063

Thank you.

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<sup>1</sup> Note that the reopening process described in the May 8, 2008 HPMS memorandum, “The Part D Reopenings Process and the Part D Appeals Process,” has been updated by the December 29, 2015 HPMS memorandum. However, the appeals process described in the May 8<sup>th</sup> memorandum is still current (with the exception of the contact information, as indicated above).