

~ Updates on HPMS Memos ~

CMS Memo Title & Release Date	Actuarial User Group Calls – Dated 3/23/2018
Summary	CMS will be hosting a series of actuarial user group calls beginning on April 12, 2018 . The calls will provide guidance on completing the Bid Pricing Tools and to respond to questions from actuaries who are preparing for Contract Year 2019 bids. The calls are scheduled for every Thursday from April 12 through May 31, 2018 at 11-12PM EST .
Action	Informational to PACE.
CMS Email Title & Release Date	MBI Transition – Timeframes Relaxed for 4Rx and Disenrollments for Failure to Pay Premiums – Dated 3/23/2018
Summary	The required timeframes for plans to submit in MARx a TC 72 for updating 4Rx data is within 72 hours after receiving the TRR file and the Disenrollment for Failure to Pay Premiums transaction which plans must submit a TC 51 is within 7 calendar days of receipt of the completed disenrollment. CMS has relaxed these two timeframes from April 1 to April 10, 2018 in preparation for the HICN to MBI transaction. However, plans must submit any transactions a plan chooses to hold during this period by April 11, 2018 .
Action	Informational to PACE.
CMS Memo Title & Release Date	CY 2019 Formulary Submission Information – Dated 3/27/2018
Summary	<p>CMS released additional information on the following to assist Part D plans with the submission of the CY 2019 formularies:</p> <ul style="list-style-type: none"> • Formulary Training Video • Technical Manual • Formulary Submission Question and Answer User Call • Formulary Reference File • Formulary Submission Window Dates
Action	Applicable to PACE plans that utilizes a formulary and submits to CMS.
CMS Email Title & Release Date	Medicare Part C Reporting Requirements – 60-day Comment Period – Dated 3/27/2018
Summary	CMS is looking for plans to comment on the proposed 2019 Part C Reporting Requirements document. Comments are to be received by May 25, 2018 . The links to the proposed document is included.

Action	Informational to PACE as PACE is excluded from the Part C Reporting Requirements.
CMS Memo Title & Release Date	2018 Data Validation Training for Contractors – Dated 3/27/2018
Summary	All Part C and D plans are required to undergo an annual validation of the data they provide as Part C and Part D Reporting Requirements. To ensure the independence and reliability of the data reported, each sponsor must select a data validation reviewer (contractor) to conduct the audit. CMS has developed a tool to train reviewers on undertaking data validation audits. The 2018 data validation training is now available. There will be four phases in the 2018 data validation process.
Action	Informational to PACE as PACE plans are excluded from Part C reporting requirements and waived from Part D reporting requirements. Refer to the memo for complete details on the course training and registration.
CMS Memo Title & Release Date	Clarification to Guidance on Medicare-Medicaid Plan (MMP) Application of Deductibles and Cost-Sharing when Reimbursing Non-Contract Providers – Dated 3/28/2018
Summary	CMS clarified the policy regarding Medicare-Medicaid Plans’ reimbursement of non-network providers for Medicare-covered services during a deductible period under fee-for-service Medicare. CMS also responded to questions received regarding how MMPs should pay claims incurred at the beginning of a benefit period.
Action	Informational to PACE.
CMS Memo Title & Release Date	Updates to Part D Coordination of Benefits Processes – Dated 3/28/2018
Summary	CMS will make updates to the Daily COB file beginning April 1, 2018 to change the format in support of the Medicare Card Project. The HICN will be replaced by the MBI on the file. The file length will remain the same. Plans will receive a full replacement COB file for all enrollees with other coverage on April 23 through April 27, 2018 .
Action	Applicable to PACE. Plans are to review the daily COB files and the full replacement COB files and notify Pharmastar of participants who has other coverage.
CMS Memo Title & Release Date	March 2018 Release Pharmacy Risk Assessment – Feedback Requested – Dated 3/29/2018

Summary	The Risk Assessment for March 2018 has been completed by CMS in collaboration with the National Benefit Integrity Medicare Drug Integrity Contractor. CMS provided a list of retail pharmacies categorized with a high-risk assessment and expects plans to use the information provided to make further determinations about potential FWA. CMS expects plans to take the actions mentioned in the memo. Any feedback on action taken on pharmacies even if they are not included in the attached list can be sent to CMS within 30 days of receipt of this memo.
Action	Applicable to PACE plans even though PACE has been removed from this analysis. Refer to memo for complete details. Pharmastar will review the list of pharmacies and reach out to plans if a pharmacy they utilized for their participants has been identified as a high-risk pharmacy on this assessment. Plans are to take the appropriate action as needed.
CMS Email Title & Release Date	Revised Contract Year 2018 Medicare—Medicaid Plan Summary of Marketing Practices and Beneficiary Disclosure Requirements – Dated 3/29/2018
Summary	CMS updated Section 80.1, Customer Service Call Center Requirements in the Calendar Year 2018 Medicare-Medicaid Plan Summary of Marketing Practices and Beneficiary Disclosure Requirements. No other changes were made. The updated version is available on the webpage provided.
Action	Informational to PACE.
CMS Memo Title & Release Date	Release of the HPMS Fiscal Soundness Module – Dated 3/29/2018
Summary	CMS released the Fiscal Soundness Module (FSM) and the reporting requirements for all types of Medicare Part D plans, including PACE. PACE plans are excluded from following the date deadline provided in the memo, but must submit its annual audited financial statements to CMS no later than 180 days after the organizations fiscal year ends.
Action	Applicable to PACE. Refer to the memo for changes applicable to PACE and for complete guidance. A filing instructions attachment is also included in the email.
CMS Email Title & Release Date	Subscribing to the Health Plan Management System (HPMS) Listserv – Dated 3/29/2018
Summary	Individuals without access to HPMS system may request to join the listserv’s supplemental mailing list to stay abreast of the agency’s communications on the Medicare Advantage and Part D programs by using the online form provided.

Action	Informational to PACE and individuals who would like to join the listserv's supplemental mailing list.
CMS Email Title & Release Date	Coverage Gap Discount Program: April Participating Labeler Code – Dated 3/29/2018
Summary	CMS will update the manufacturer labeler codes for the Coverage Gap Discount Program by April 1, 2018 . The updates include adding 71143 OptiNose.
Action	Although the Coverage Gap Discount Program does not apply to PACE, the participating labeler codes are applicable because only brand name prescriptions with NDCs from these codes are accepted for Part D payment. Pharmastar has made the necessary software adjustments to accommodate for the updated codes.
CMS Email Title & Release Date	Release of the PACE Quality Monitoring and Reporting Guidance – Dated 3/30/2018
Summary	CMS released the PACE Quality Monitoring and Reporting Guidance. It is located on the website provided.
Action	Applicable to PACE. Refer to the email for the link to the guidance.
CMS Memo Title & Release Date	Instructions for Requesting Electronic Signature Access in the Health Plan Management System (HPMS) – Dated 3/30/2018
Summary	CMS required that authorized officials (CEO, CFO, COO) of the organization sign documents and complete attestations using the electronic signature process in HPMS. The memo provides the process for requesting electronic signature access for new users that need CMS user ID and electronic signature access, existing users that needs to add electronic signature access, existing electronic signature user that needs to add or delete contracts, and existing electronic signature user with no changes needed.
Action	Applicable to PACE. Refer to the memo for complete details and take the action needed for your plan.
CMS Memo Title & Release Date	New Medicare Beneficiary Identifier (MBI) in the Health Plan Management System (HPMS) – Dated 3/30/2018
Summary	CMS address the transition to the new MBIs for the following: <ul style="list-style-type: none"> • Complaint Tracking Module (CTM) • National Risk Adjustment Data Validation (RADV) Module • Beneficiary-Level Medication Therapy Management Program (MTMP)

Action	<ul style="list-style-type: none"> • Performance Metrics Module • Audit Module <p>Applicable to PACE. Refer to the memo for complete details on items that may be applicable to your plan.</p>
CMS Email Title & Release Date	Announcement of Calendar Year (CY) 2019 Medicare Advantage Capitation Rates and Medicare Advantage and Part D Payment Policies and Final Call Letter – Dated 4/2/2018
Summary	CMS released the 2019 Medicare Advantage Capitation Rates and Medicare Advantage and Part D Payment Policies and Final Call Letter. CMS will host a call on April 3, 2018 at 3PM EST to discuss the 2019 Rate Announcement and Call Letter along with the Part D Final Rule (CMS-4182-F).
Action	Applicable to PACE. Review the final call letter and Part D final rule for items that are applicable to your plan. For individuals interested in participating in the call, refer to the email for dial in information.
CMS Email Title & Release Date	Preview of the 2019 Part C & D Final Rule – Dated 4/2/2018
Summary	CMS is offering a preview of the Part D CY 2019 (CMS-4182-F) Final Rule. The final rule can be found at the link provided before it’s published in the Federal Register.
Action	Informational to PACE. Refer to the final rule for items that may be applicable to your plan.
CMS Memo Title & Release Date	Applicability of Contract Year (CY) 2019 Final Call Letter Provisions to Medicare-Medicaid Plans – Dated 4/3/2018
Summary	CMS provided clarification to MMPs on the applicability of the provisions in the CY 2019 Final Call Letter issued on April 2, 2018 .
Action	Informational to PACE.
CMS Email Title & Release Date	Posting of Quarterly 2018 Plan Benefit Data on www.cms.gov – Quarter 3 – Dated 4/3/2018
Summary	The Contract Year 2018 approved plan benefit data for Quarter 3 is available on the CMS public website.
Action	Informational to PACE.
CMS Memo Title & Release Date	Qualified Medicare Beneficiary Program Information in Remittance Advice and Explanation of Benefits – Dated 4/3/2018

Summary	CMS provided information to plans on how to incorporate Qualified Medicare Beneficiary (QMB) information in the plan’s Remittance Advice (RA) based upon the upcoming changes to the Medicare Fee for Services RA that will take effect on July 2, 2018 . In addition, how to incorporate the QMB information in the Explanation of Benefits to beneficiaries to promote beneficiary awareness of their protections from being billed for Medicare A/B services.
Action	Informational to PACE.
CMS Memo Title & Release Date	Medicare Advantage/Prescription Drug System (MARx) April 2018 Payment – INFORMATION – Dated 4/3/2018
Summary	<p>CMS released information about the April payment which was sent out on March 30, 2018 and may require plan action on the following:</p> <ul style="list-style-type: none"> • May Software Release Update • Final 2017 Risk Adjustment Reconciliation • New MARx “OPT-out” Link • New Medicare Card Project – MARx Changes
Action	Applicable to PACE. Refer to the memo for items that are applicable to your plan.
CMS Memo Title & Release Date	Updates to the Prescription Drug Event (PDE) Analysis Website and Data Quality Review Process for the Coverage Gap Discount Program, Manufacturer Disputes, and Part D Payment Reconciliation – Dated 4/4/2018
Summary	CMS provided updates to the Prescription Drug Event Analysis Website and Data Quality Review Process for the Coverage Gap Discount Program, Manufacturer Disputes, Part D Payment Reconciliation and to the process with the Coverage Gap Discount Program Withheld PDE. Plans are also reminded of their roles and responsibilities regarding these activities.
Action	Informational to PACE. Refer to the memo for updates that are applicable to your plan.

Please note that this information is provided to you in summary form for general informational purposes only and does not constitute legal or regulatory compliance advice. It is your responsibility to consult with your Compliance Officer and/or legal counsel to determine applicability of any regulation or standards referenced herein to your organization and/or processes.