

~ Updates on HPMS Memos ~

CMS Memo Title & Release Date	Additional Guidance for Chart Review Record (CRR) Submissions – Dated 8/28/2018
Summary	CMS released additional guidance to clarify the role of chart review records as part of the Encounter Data System.
Action	Informational to PACE. Refer to the memo for complete details.
CMS Memo Title & Release Date	Updates to the Coverage Gap Discount Program (CGDP) – Dated 8/28/2018
Summary	CMS is informing plans of two upcoming changes to the Medicare Part D Coverage Gap Discount Program. The memo also addresses the operational changes that will be made because of the changes to the Bipartisan Budget Act of 2018.
Action	Informational to PACE. Refer to the memo for complete details.
CMS Memo Title & Release Date	Indication-Based Formulary Design Beginning in Contract Year (CY) 2020 – Dated 8/29/2018
Summary	CMS provided additional guidance to plans on how they can expand the indication-based utilization management strategies to include indication-based formulary design beginning in CY 2020.
Action	Informational to PACE plans that utilizes and submits a formulary to CMS.
CMS Email Title & Release Date	2019 Step Therapy Qs & As – Dated 8/29/2018
Summary	CMS has issued a Questions & Answers document to accompany a previous HPMS memo regarding prior authorization and step therapy for Part B drugs. The document can be found on the weblink provided.
Action	Informational to PACE plans that utilizes and submits a formulary to CMS.
CMS Memo Title & Release Date	Updates to MMP Medicare A/B Rate Methodology for CY 2019 – Dated 8/30/2018
Summary	CMS summarized the feedback and comments received on the proposed rate methodology for CY 2019 and provided information on CMS’ decision to implement the approach as proposed.
Action	Informational to PACE. Refer to the memo for complete details.

CMS Memo Title & Release Date	Medicare Advantage/Prescription Drug System (MARx) September 2018 Payment – INFORMATION – Dated 8/30/2018
Summary	<p>CMS provided information about the September payment which is scheduled for September 1, 2018 and may require plan action:</p> <ul style="list-style-type: none"> • National Medicare Education Campaign (NMEC)/ Coordination of Benefits (COB) User Fees • Third 2015 Final Risk Adjustment Reconciliation
Action	Informational to PACE. Refer to the memo for complete details and items that may be applicable to your plan.
CMS Memo Title & Release Date	Advance Announcement of the Fall 2018 Software Releases – Dated 8/30/2018
Summary	<p>CMS continues to implement software improvements to the enrollment and payment systems that support Medicare Advantage and Prescription Drug programs (MAPD). The plan released of systems changes scheduled for fall 2018 include the following and may require plan action:</p> <ul style="list-style-type: none"> • Changes to Default Enrollment Process for Newly Eligible Medicare Beneficiaries • Discontinuation of the MADP and MA-OEP • Limitations in Use of the SEP for Dually Eligible and LIS Beneficiaries • Inclusion of the NDCs on Certain OHI Records • Enhanced Point of Sale Drug Claim Edit Functionality (CARA)
Action	Applicable to PACE plans. Refer to the memo for complete details on the release system changes.
CMS Memo Title & Release Date	2017 Attestations of Prescription Drug Event (PDE) Data, Direct and Indirect Remuneration (DIR) Data, Monthly Plan-to-Plan (P2P) Reconciliation Payments, and the Detailed DIR Report – Dated 8/30/2018
Summary	<p>CMS requires all plans that were active in 2017 to electronically sign and attest to the below Part D data in HPMS:</p> <ul style="list-style-type: none"> -2017 Data Relating to CMS Payment to Medicare Part D Sponsor -2017 Data Relating to Detailed DIR Report (except for PACE plans that submitted zero total dollars on their 2017 DIR Summary Report) -2017 Record and Attestation of P2P Reconciliation Payments <p>Completion of the Record of P2P reconciliation Payments must be uploaded to HPMS at the same time the Plan to Plan Reconciliation</p>

Action	<p>Payment Data is signed. The attestations will be available through HPMS on September 4, 2018 to September 14, 2018 NOON EST and is to be signed by the CEO, CFO, or COO.</p> <p>Applicable to PACE. Refer to the memo for complete details on how to complete the attestations. Your Pharmastar Client Support Specialist can assist and is available to answer any questions you may have on the Record of P2P Reconciliation Payments.</p>
CMS Memo Title & Release Date	<p>Default Enrollment Option for newly Medicare Advantage Eligible Medicaid Managed Care Plan Enrollees (Formerly known as “Seamless Conversion Enrollment”) – Dated 8/31/2018</p>
Summary	<p>CMS released guidance to MAOs on the new default enrollment process established in the CMS-4182-F. CMS will allow automatic enrollment of Medicaid managed care plan enrollees into an integrated dual eligible MA special needs plan offered by the same organization. MAOs wanting CMS to conduct default enrollment will submit their proposal to CMS via HPMS starting on October 1, 2018.</p>
Action	<p>Informational to PACE. Refer to the memo for complete details.</p>
CMS Email Title & Release Date	<p>Coverage Gap Discount Programs: September Participating Labeler Code – Dated 9/4/2018</p>
Summary	<p>CMS will update the below participating manufacturer labeler codes for the Coverage Gap Discount Program to include 71779 Verastem, Inc. and 25021 Sagent Pharmaceuticals, Inc.</p>
Action	<p>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 will make the necessary software adjustments to accommodate for the change.</p>
CMS Memo Title & Release Date	<p>Long-Term Institutionalized Resident Report – Dated 9/4/2018</p>
Summary	<p>The third 2018 LTI Resident Report will be distributed to plans on September 4, 2018. Organizations will only receive a LTI report if they have LTI enrollees. The layout of the file and a description of best practices related to plan’s use of the report is provided.</p>
Action	<p>Informational to PACE plans who receives the LTI Resident Reports.</p>
CMS Memo Title & Release Date	<p>Release of the Revised CY2019 Medicare Communications and Marketing Guidelines – Dated 9/6/2018</p>

Summary	CMS announced the release of an updated version of the CY 2019 Medicare Communications and Marketing Guidelines on the Managed Care Marketing website. Changes to the guidelines were made based on questions and comments received by CMS. A summary of the changes is provided.
Action	Informational to PACE as PACE does not follow the MAPD marketing guidelines.

Important Date Reminders

Date	Item
September 4, 2018 – September 14, 2018 Noon EDT	2017 Attestations of PDE, DIR Data, P2P Reconciliation Payments and Detailed DIR Report Submission Period
January 1, 2019	Preclusion List Requirement Begins
<i>*Subject to change, forthcoming information to be release by CMS.</i>	

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