

~ Updates on HPMS Memos ~

<p>CMS Memo Title & Release Date</p>	<p>2019 Reassignment of Low-Income Subsidy Beneficiaries in Non-Renewing Medicare Advantage Plans and Medicare Advantage Plans Reducing Their Service Area – Dated 9/21/2018</p>
<p>Summary</p>	<p>CMS will conduct reassignments of beneficiaries eligible for the Part D low-income subsidy who are enrolled in certain Medicare Advantage (MA) plans. The reassignment occurs for MA plans that are non-renewing or have an approved SAR as of 2019. CMS will process reassignment transactions and transmit a special TRR to plans on or around October 17, 2018.</p>
<p>Action</p>	<p>Informational to PACE. Refer to the memo for additional information and detail on the process in the event that such reassignment affects your participants.</p>
<p>CMS Memo Title & Release Date</p>	<p>2019 Reassignment of Low-Income Subsidy Beneficiaries in Prescription Drug Plans – Dated 9/21/2018</p>
<p>Summary</p>	<p>CMS will conduct reassignment of certain beneficiaries eligible for the Part D low-income subsidy in October. CMS will carry out all reassignments including those to a different plan benefit package offered by the same organization, as well as to plans offered by different sponsors. CMS will not reassign those who no longer qualify for LIS, or those who have chosen a plan on their own. CMS will reassign only individuals who are LIS-eligible in 2018, as they will remain LIS-eligible in 2019</p>
<p>Action</p>	<p>Informational to PACE. PACE organizations should review the memo for items that may be applicable in the event such reassignment affects your participants.</p>
<p>CMS Memo Title & Release Date</p>	<p>Encounter Data Software Release – Dated 9/25/2018</p>
<p>Summary</p>	<p>CMS continues to implement software improvements on accepting and processing encounter data to support Medicare Advantage program. The memo provides detailed information regarding the release of systems changes implemented on September 28, 2018 as well as submission and policy guidance related to the changes, if applicable. The Encounter Data Processing System changes are listed and may require plan action.</p>
<p>Action</p>	<p>Applicable to PACE. Refer to the memo for items that may be applicable to your plan.</p>

CMS Memo Title & Release Date	2018 Part C and D Reporting Requirements Data Validation Results – Dated 9/28/2018
Summary	CMS released the results of the data validation reviews for CY 2017 Medicare Part C and D data which was conducted on April 1, 2018 and June 30, 2018.
Action	Informational to PACE as PACE is excluded from the Part C reporting requirements and waived of the Part D reporting requirements.
CMS Memo Title & Release Date	Medicare Advantage/Prescription Drug System (MARx) October 2018 Payment – INFORMATION – Dated 9/28/2018
Summary	CMS released information about the October payment and other payment related items that may require plan action: <ul style="list-style-type: none"> • 2011 Overpayment Risk Adjustment Reconciliation • Coverage Gap Discount (CGD) Invoice Offsets
Action	Informational to PACE plans, refer to the memo for items that may be applicable to your plan.
CMS Email Title & Release Date	Coverage Gap Discount Program L October Participating Labeler Code – Dated 9/28/2018
Summary	CMS will update the below participating manufacturer labeler codes for the Coverage Gap Discount Program by October 1, 2018 to include the following: 72511 Amgen USA Inc.
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 will make the necessary software adjustments to accommodate for the change.
CMS Memo Title & Release Date	September 2018 Release Pharmacy Risk Assessment – Feedback Requested – Dated 9/28/2018
Summary	The Risk Assessment for September 2018 has been completed by CMS in collaboration with the National Benefit Integrity Medicare Drug Integrity Contactor. 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 Memo Title & Release Date	End-of-Year 2018 Enrollment and Payment Systems Processing Information – Dated 10/1/2018
Summary	CMS provided information to support plans in their end-of-year enrollment and payment systems processing activities to ensure a successful transition to CY 2019 regarding: <ol style="list-style-type: none"> 1. Medicare Advantage & Prescription Drug System Transaction Processing 2. Rollover and Terminating Plan MARx Transaction Processing 3. Plan Reports and System User Interface Availability
Action	Applicable to PACE. Refer to the memo for items that may be applicable to your plan and take the appropriate actions as needed.
CMS Memo Title & Release Date	Request for Comment on Medicare Rx (MRx) Plan Benefit Package (PBP) Enhancements – Dated 10/1/2018
Summary	CMS is looking for feedback from plans regarding potential changes or enhancements to the Medicare Rx Section of the Plan Benefit Package given the closure of the coverage gap in CY 2020.
Action	Informational to PACE as the request does not apply to PACE plans.
CMS Memo Title & Release Date	Posting of 2019 Plan Benefit Data and Plan Crosswalk Data on www.cms.gov – Dated 10/2/2018
Summary	CMS released the CY 2019 approved plan benefit data and plan crosswalk data on the CMS website. The links to the data are provided.
Action	Informational to PACE.
CMS Memo Title & Release Date	2019 Readiness Checklist for Medicare Advantage Organizations, Prescription Drug Plans, Medicare-Medicaid Plans, and Cost Plans – Dated 10/2/2018
Summary	The CY 2019 Readiness Checklist from CMS summarizes key operational requirements for organizations to review and perform their own internal audits for 2019 preparedness and eventual reporting purposes.

Action	Applicable to PACE. Refer to the memo for additional details and items applicable to your plan. Any questions should be addressed to the appropriate individual(s) listed on the attachment Appendix A. Pharmastar will review and provide a list of the sections applicable to Pharmastar and supporting policy and procedures to how they will be handled.
CMS Memo Title & Release Date	Request for Review – Draft Part C & Part D Appeals Guidance – Dated 10/2/2018
Summary	CMS consolidated Chapter 13 of the Medicare Managed Care Manual and Chapter 18 of the Prescription Drug Benefit Manual into one guidance document. CMS is seeking comments on the revised guidance. Comments can be sent to CMS by October 22, 2018 .
Action	Informational to PACE. Refer to the memo for a list of the changes made to the revised guide.
CMS Email Title & Release Date	Medicare Prescription Drug Benefit Manual- Chapter 13 and 14 – Dated 10/3/2018
Summary	CMS revised two chapters of the Medicare Prescription Drug Benefit Manual. Both updated chapters on available online at the link provided.
Action	Applicable to PACE. PACE plans should review the Chapter 14 revisions Appendix D as it is PACE specific and may apply to your plan.
CMS Memo Title & Release Date	Announcement of the Fall 2018 Software Releases – Dated 10/4/2018
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 the fall include the following and may require plan action:</p> <ul style="list-style-type: none"> • Changes to the 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 National Drug Codes on Certain OHI Records • Enhanced Functionality for Drug Management Programs
Action	Applicable to PACE plans. Refer to the memo for complete details on the release system changes and items applicable to your plan.

CMS Memo Title & Release Date	Participation in the 2019 HOS for MA Organizations Planning to Sponsor FIDE SNPs in 2020 – Dated 10/4/2018
Summary	CMS released information to MA organizations that anticipates sponsoring a FIDE SNP in 2018 and that wants to participate in the 2019 HOS or HOS-M. For interested MA organizations, the list of information requested must be provided to CMS by October 31, 2018 .
Action	Informational to PACE. Refer to the memo for additional details if your plan is interested in participating.

Important Date Reminders

Date	Item
January 1, 2019	Preclusion List Requirement Begins
<i>*Subject to change, forthcoming information to be release by CMS.</i>	

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.