

~ Updates on HPMS Memos ~

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| CMS Memo Title & Release Date | Designation of Enterprise Identity Management (EIDM) Plan User Approver/External Point of Contact (EPOC) – ACTION – Dated 8/23/2019 |
| Summary | CMS released the requirements and process a plan must use to designate staff that will be responsible for granting access to their data in the CMS systems as well as the responsibilities of a CMS External Point of Contact (EPOC). |
| Action | Applicable to PACE. Refer to the memo for complete instructions on the EPOC registration process and annual certification requirements which are due by December 1st of each year. Contact MAPD Helpdesk for any questions. |

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| CMS Email Title & Release Date | Coverage Gap Discount Program: September Participating Labeler Code – Dated 8/28/2019 |
| Summary | CMS will update the following participating manufacturer labeler code for the Coverage Gap Discount Program by September 1, 2019 . The updates include the following to be added: 49938 Jacobus Pharmaceutical Company 71770 Medunik USA |
| 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. |

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| CMS Memo Title & Release Date | Medicare Advantage/Prescription Drug System (MARx) September 2019 Payment – INFORMATION – Dated 8/28/2019 |
| Summary | CMS released information about the September payment which is scheduled for August 30, 2019 and the New Medicare Card Transition scheduled for December 31, 2019 that may require plan action. |
| Action | Applicable to PACE. Refer to the memo for items that may be applicable to your plan. |

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| CMS Memo Title & Release Date | Drug Alert: Nuedexta – Effect of Prior Authorizations (PA) on Potential Inappropriate Part D Billing for Non-Medically Accepted Indications – Dated 8/28/2019 |
| Summary | CMS encourages plans to monitor the Medicare Part D utilization of Nuedexta and other drugs likely to be used for non-medically accepted |

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| | indications and take actions to ensure those drugs are being used appropriately. |
| Action | Applicable to PACE. Refer to the memo for complete details. Pharmastar does provide a Medical Necessity Report. Any questions regarding the report can be sent to your Client Support Specialist. |

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| CMS Memo Title & Release Date | 2018 Attestations of Prescription Drug Data, Direct and Indirect Remuneration Data, Monthly Plan-to-Plan Reconciliation Payments, and the Detailed DIR Report – Dated 8/30/2019 |
| Summary | <p>CMS requires all plans that were active in 2018 to electronically sign and attest to the below Part D data in HPMS:</p> <ul style="list-style-type: none"> -2018 Data Relating to CMS Payment to Medicare Part D Sponsor -2018 Data Relating to Detailed DIR Report (except for PACE plans that submitted zero total dollars on their 2018 DIR Summary Report) -2018 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 Payment Data is signed. The attestations will be available through HPMS on September 3, 2019 to September 13, 2019 Noon ET and is to be signed by the CEO, CFO, or COO.</p> |
| Action | Applicable to PACE. Refer to the memo for complete details on how to complete the attestations. Pharmastar can assist and is available to answer any questions you may have on the Record of P2P Reconciliation Payments. If Pharmastar generated the Detailed DIR data for your plan, an attestation will be provided for your records to certify that the information provided is accurate, complete and truthful based on Pharmastar best knowledge, information, and belief. |

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| CMS Memo Title & Release Date | Release of Encounter Data Report Cards Q2 2019 – Information – Dated 8/30/2019 |
| Summary | CMS announced the availability of the Q2 2019 encounter data report cards in HPMS. Each report card presents information on the encounter data submitted by your organization. PACE plans will not have reports for Sections 5 and 6. Technical notes with detailed information about the methodology used in preparing the report cards is included. |
| Action | Applicable to PACE. Refer to the memo for complete details. |

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| CMS Memo Title & Release Date | Optional CY 2020 Formulary Enhancement Submission Window – Dated 8/30/2019 |
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| Summary | CMS is to offer a final CY 2020 formulary submission window that will allow plans to submit formulary enhancements to CMS prior to the start of 2020. The additional window will allow plans the opportunity to submit formulary changes so that the Medicare Plan Finder displays accurate and up-to-date formulary information during the Annual Election Period. Plans may submit their CY 2020 formulary enhancements between 12 AM ET September 23, 2019 and 5 PM ET on September 26, 2019. |
| Action | Applicable to PACE plans who utilize and submits a formulary to CMS. Refer to the memo for complete details. |

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| CMS Memo Title & Release Date | Long-Term Institutionalized Resident Report – Dated 8/30/2019 |
| Summary | The third 2019 LTI Resident Report will be distributed to plans on September 3, 2019. Organizations will only receive an LTI report if they have LTI enrollees. The layout of the file is provided. |
| Action | Informational to PACE plans who receives the LTI Resident Reports. Refer to the memo for complete details. |

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| CMS Memo Title & Release Date | New Mailboxes for Medicare Parts C & D Appeals and Medicare Enrollment and Eligibility Policy – Dated 8/30/2019 |
| Summary | CMS announced the launch of new CMS mailbox portals for Medicare Parts C & D appeals and Medicare enrollment and eligibility policy questions. Links to access the new mailboxes are provided. |
| Action | Applicable to PACE. Refer to the memo for complete details. |

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| CMS Email Title & Release Date | Revised EOC Model Language for Plans Offering Part D Coverage – Dated 9/4/2019 |
| Summary | CMS has revised language in the Evidence of Coverage models for plans due to the income related monthly adjustment amount being released later than it has in prior years. Plans can view the updated model materials at the link provided. |
| Action | Informational to PACE. |

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| CMS Memo Title & Release Date | Final Announcement of September 2019 Encounter Data Software Release Updates – Dated 9/5/2019 |
| Summary | CMS announced the final updated release of system changes scheduled for September 27, 2019 for accepting and processing encounter data. The changes will include the following: <ul style="list-style-type: none"> • New Edit 25010 Modifier Invalid for DOS |

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| Action | <ul style="list-style-type: none"> • New Edit 27005 Non-ESRD HCPCS for ESRD PPS Encounter • Updated Edit 00805 Deleted Diagnosis Code Not Allowed <p>Applicable to PACE. Refer to the memo for complete details on the system changes.</p> |
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Important Date Reminders

| Date | Item |
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| September 3-September 13, 2019 (Noon ET) | 2018 Attestation of Prescriptions Drug Event Data, Direct and Indirect Remuneration Data, Monthly Plan to Plan Reconciliation Payments and the Detailed DIR Report Submission Window |
| September 30, 2019 (1 PM ET) | 2014 PDE Data Submission Deadline for CY 2014 Part D Payment Reconciliation Reopening |
| October 2019* | Annual Full File Replace ATBT and NX Report Distribution Email List for 2017-2020 |
| October 2019* | 2020 Readiness Checklist for Medicare Advantage, Prescription Drug Plans, and Cost Plans |
| December 31, 2019 | HICN to MBI Transition Ends |
| <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.