

~ Updates on HPMS Memos ~

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| CMS Memo Title & Release Date | Release of Notice of Intent to Apply for Contract Year 2021 Medicare Advantage, Medicare-Medicaid Plans, and Prescription Drug Benefit and Related CY 2021 Application Deadlines – Dated 10/17/2019 |
| Summary | CMS announced the release of the CY 2021 Notice of Intent to Apply (NOIA) web tool and key dates for the CY 2021 Medicare Advantage (Part C) and Prescription Drug Benefit (Part D) application cycle. The memo details the CY 2021 application cycle key dates. |
| Action | Informational to PACE as PACE plans have their own application process. |
| CMS Memo Title & Release Date | Request for Plan Contact Information for Risk Adjustment Data Submissions – Dated 10/17/2019 |
| Summary | CMS created an Encounter Data & Risk Adjustment Operations Contact field within HPMS which will enable CMS to communicate related risk adjustment data submissions and operations with the plan. CMS request each plan to designate an individual to be the main point of contact within HPMS by December 31, 2019 through the path link provided. |
| Action | Applicable to PACE. Refer to the memo for complete details. |
| CMS Email Title & Release Date | Draft Applicable Integrated Plan Coverage Decision Letter 60- day Comment Period – Dated 10/21/2019 |
| Summary | CMS announced an opportunity for Medicare Advantage Dual Eligible SNP and other stakeholders to comment on the proposed Applicable Integrated Plan Coverage Decision Letter. The link to the published proposed document is provided. Comments can be sent by December 17, 2019 . |
| Action | Informational to PACE. |
| CMS Memo Title & Release Date | Announcement of the November 2019 Software Release – Dated 10/21/2019 |
| Summary | <p>CMS provided information regarding the planned release of systems changes scheduled for November 2019. The software changes will include the following:</p> <ul style="list-style-type: none"> • Enrollment Election Type Changes for 2020 • Allow Updates to Legacy Point of Sale (POS) Edit Records (Implemented Prior to 2019) |

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| | <ul style="list-style-type: none"> • Automatic Number of Uncovered Months Resets for Low Income Beneficiaries in U.S. Territory Part D Plans • New Medicare Card Project Transition Period – MARx Reminder |
| Action | Applicable to PACE. Refer to the memo for complete details on items that are applicable to your plan. |
| CMS Email Title & Release Date | 2019 Call Center Monitoring Performance Metrics for Timeliness Study, Quarter 3 – Dated 10/22/2019 |
| Summary | <p>The following two data sets for the 2019 Performance Metrics for Accuracy and Accessibility Study will be available for plans to review within the next few days in HPMS:</p> <ul style="list-style-type: none"> - Call center accuracy and accessibility performance metrics data - Call level raw data |
| Action | Informational to PACE as PACE does not follow the Medicare Advantage Prescription Drug marketing guidelines. |
| CMS Memo Title & Release Date | CMS Mailing to Enrollees in Consistently Low Performing Plans – Dated 10/22/2019 |
| Summary | CMS will begin mailing beneficiaries in late-October a notice to alert them of their sponsor or organization’s low ratings to encourage the beneficiary to review higher rated plan options during the annual election period. The notice informs enrollees of an opportunity to move into a higher quality plan in 2020. |
| Action | Informational to PACE. |
| CMS Email Title & Release Date | Termination of Coverage Gap Discount Program Agreement for Espero Pharmaceuticals (P1480), Labeler Codes 70003 and 70007 – Dated 10/23/2019 |
| Summary | CMS has terminated the Coverage Gap Discount Program with Espero Pharmaceuticals effective October 31, 2019 . As of that termination date, the labeler codes 70003 and 70007 can no longer be covered under Medicare D. |
| 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 Email Title & Release Date | CMS 2019 MA & PDP Fall Conference & Webcast Announcement – Registration Closing in 5 days – Dated 10/27/2019 |

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| Summary | CMS remind plans of the registration window for the MA PDP Fall Conference event on November 7, 2019 . The in-person registration will close on October 29, 2019 . Attached is a list of the session topics and additional information on how to register. |
| Action | Informational to PACE. For individuals who are interested in joining, refer to the memo for complete details and how to register. |
| CMS Memo Title & Release Date | Part D Pricing File Submission Updates – Dated 10/25/2019 |
| Summary | CMS provided updates to the Part D Pricing File Submission module in HPMS. The below were updated: <ul style="list-style-type: none"> - Updated Reference Data Schedule - Non-Formulary Reference File NDC Validation |
| Action | Informational to PACE as it does not apply to PACE plans. |
| CMS Memo Title & Release Date | Availability of Medicare Health Outcomes Survey (HOS) Cohort 19 Performance Measurement Data – Dated 10/25/2019 |
| Summary | CMS announced the release of the Medicare HOS 2016-2018 Cohort 19 Performance Measurement beneficiary level data. The HOS data are intended to support quality improvement activities and initiatives. Plans can obtain their data from HSAG by contacting the HOS information and technical support email provided. |
| Action | Informational to PACE as PACE does not participant in the Health Outcomes Survey (HOS) program. |
| CMS Memo Title & Release Date | Part D Coordination of Benefits Update – Dated 10/25/2019 |
| Summary | There will be a new report called the Pharmacy Benefit Manager Financial Information Reporting (PBM FIR) Reject Aging Report that will be available beginning January 2, 2020 . The report allows plans the ability to manage FIR transactions which are part of the Automated True Out-Of-Pocket Balance Transfers. The PBM FIR will exclude protected health information but will include unresolved FIR transaction for current and three prior calendar years. Plans are encouraged to designate a PBM contact to receive the PBM FIR Aging report. |
| Action | Applicable to PACE plans who are set up with the ATBT process. Your Client Support Specialist will provide you the PBM contact information, if you would like Pharmastar to receive the PBM FIR Aging reports. |

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| CMS Memo Title & Release Date | Attestation of Prescription Drug Event (PDE) Data and Direct and Indirect Remuneration (DIR) Data related to the 2014 Reopening – Dated 10/25/2019 |
| Summary | CMS announced the global reopening of the 2014 Part D payment reconciliation back in April 2019. All Part D Sponsors must sign the Attestation of Data Relating to CMS Payment to a Medicare Part D Sponsor. The attestation will be available through HPMS on October 28, 2019 and must be electronically signed in HPMS by noon ET, November 4, 2019 . Instructions on signing the attestation is provided. |
| Action | Applicable to PACE. Refer to the memo for complete details. |
| CMS Memo Title & Release Date | Medical Loss Ratio Data Form and Attestation Submission Reminder for Contract Year 2018 – Dated 10/25/2019 |
| Summary | CMS reminds plans that the upload functionality for CY 2018 MLR Reports will be available in HPMS on November 8, 2019 . The electronic Attestation functionality for CY 2018 MLR will be available on December 9, 2019 . The CY 2018 MLR attestations must be submitted in HPMS by 11:59 PM PT on December 18, 2019 . |
| Action | Informational to PACE as the MLR provision does not apply to PACE. |
| CMS Memo Title & Release Date | Contract Year 2020 Monitoring of Posted Comprehensive Formularies – Dated 10/29/2019 |
| Summary | CMS provided a summary of the results of CY 2019 monitoring of the posting and accuracy of plan formulary documents and announced the analysis will be performed again for CY 2020 effective January 1, 2020 . CMS will randomly select a number of Part D plans for the CY 2020 analysis which will exclude PACE plans. |
| Action | Informational to PACE. |
| CMS Email Title & Release Date | Proposed Collection for Application for Programs of All-Inclusive Care for the Elderly (PACE) – 60 Day Comment Period – Dated 10/30/2019 |
| Summary | CMS is looking for comments on the proposed PACE application and other supporting data collection instruments. The 60- day notice for the proposed PACE application and application process is published at the provided link. Comments can be submitted by December 30, 2019 . |
| Action | Applicable to PACE. For individuals submitting comments on the processed PACE application and process, refer to the email for complete details. |

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| CMS Memo Title & Release Date | Medicare Advantage Encounter Data Submission Performance Reports – October 2019 – Dated 10/30/2019 |
| Summary | CMS announced the availability of an updated set of encounter data submission performance reports. The reports are being sent to notify plans of their current status for each encounter data submission performance metric and is available via the Encounter Data Report Card link on the HPMS portal. |
| Action | Applicable to PACE. Refer to the memo for complete details. |
| CMS Email Title & Release Date | Coverage Gap Discount Program: November Participating Labeler Code – Dated 10/31/2019 |
| Summary | <p>CMS will make the following updates to the list of participating manufacturer labeler codes by November 1, 2019.</p> <p>Added:</p> <ul style="list-style-type: none"> 63801 SMG Pharmaceuticals LLC (effective 9/1/19) 71403 EPI Health, LLC (effective 9/1/19) 72000 Nabriva Therapeutics US, Inc 72786 Global Blood Therapeutics, Inc. <p>Deleted:</p> <ul style="list-style-type: none"> 70003 Jacksonville Pharmaceuticals 70007 Espero Pharmaceuticals |
| 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 Memo Title & Release Date | Medicare Advantage/Prescription Drug System (MARx) November 2019 Payment – INFORMATION – Dated 10/31/2019 |
| Summary | <p>CMS provided information about the November payment which is scheduled for November 1, 2019 and may require plan action:</p> <ul style="list-style-type: none"> • CY 2018 Part D Payment Reconciliation • Coverage Gap Discount (CGD) Missing in Plan Payment for Enrollments Effective June 2019 • Change in State and County Code (SCC) for Some Residence Address Records • New Medicare Card Project Transition Period – MARx Reminder • Changes to MARx Plan Transaction Processing |

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| 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 | CMS Update on Medicare Part D Payments to Medicare-Medicaid Plans for Contract Year 2020 – Dated 10/31/2019 |
| Summary | CMS provided information to Medicare-Medicaid Plans (MMPs) regarding the Contract Year (CY) 2020 Part D Administrative Cost Ratio used for reconciliation of Part D risk corridors applicable to MMPs for the direct subsidy portion of the Part D payment. |
| Action | Informational to PACE. |

Important Date Reminders

| Date | Item |
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| November 31, 2019 Noon ET | 2014 PDE DIR Attestation Deadline |
| December 16, 2019 | Annual Full File Replace ATBT and NX Report Distribution Email List for 2017-2020 Deadline |
| December 31, 2019 | 2020 Readiness Checklist- <i>review and have all applicable items in place for 2020</i> |
| 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.