

~ Updates on HPMS Memos ~

CMS Memo Title & Release Date	2020 Medicare Part D Low-Income (LIS) Income and Resource Standards– Dated 2/25/2020
Summary	CMS provided updated income and resource standards for individuals who apply for the low-income subsidy for Medicare Part D. The 2020 Poverty Guidelines and description of the methodology CMS used to update the resource limits for 2020 is provided.
Action	Informational to PACE.
CMS Memo Title & Release Date	Completion of the Coverage Gap Discount Reconciliation of Benefit Year 2018– Dated 2/25/2020
Summary	CMS completed the calculations for the 2018 Final Part D Coverage Gap Discount Reconciliation (CGD). The CGD reconciliation reports will be available on February 26, 2020 . Payment adjustments to remit and recover the calculated CGD reconciliation amounts are planned for April 2020 payment.
Action	Informational to PACE as the Coverage Gap Discount does not apply.
CMS Email Title & Release Date	Coverage Gap discount Program: March Participating Labeler Codes– Dated 2/26/2020
Summary	CMS list of participating manufacturer labeler codes will be updated by March 1st, 2020 on the following: Added: 72426 Esperion Therapeutics, Inc 71376 Ironshore Pharmaceuticals, Inc. Deleted: 42478 Rouses Point Pharmaceuticals LLC 24090 Akrimax Pharmaceuticals, LLC
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) March 2020 Payment – INFORMATION – Dated 2/27/2020
Summary	CMS released information about the March payment which is scheduled for March 1st, 2020 and may require plan action on the following:

	<ul style="list-style-type: none"> • Changes to MARx Plan Transaction Processing • 2014 Part D Reopening • Coverage Gap Discount (CGD) Invoice Offsets • Frailty Factor Update • Medicaid Status Errors • Missing Low Income Subside (LIS) and Subsequent Initial Enrollment Period Number of Uncovered Months (NUNCMO) Resets • Automatic Number of NUNCMO Resets for Low Income Beneficiaries in U.S. Territory Part D Plans
Action	Applicable to PACE. Refer to the memo for items that may be applicable to your plan.
CMS Email Title & Release Date	2021 Part D Reporting Requirements – 60-day Comment Period – Dated 2/28/2020
Summary	CMS is looking for comments on the proposed 2021 Part D Reporting Requirements document. Comments can be sent electronically or by mail by April 27, 2020 . The links to the proposed document is provided.
Action	Informational to PACE.
CMS Memo Title & Release Date	2019 Call Center Monitoring Performance Metrics for Timeliness Study, Quarter 4 – Dated 2/28/2020
Summary	CMS released the elements and studies on the Part C and Part D call center monitoring for 2019 Quarter 4.
Action	Informational to PACE. Refer to the email for further details.
CMS Memo Title & Release Date	Civil Money Penalty Enforcement Actions for 2019 Program Audits– Dated 2/28/2020
Summary	CMS published the Civil Money Penalties (CMPs) found during the plan’s 2019 Program Audit. All program audit related CMP notices will be posted on the Part C and Part D Enforcement Actions webpage to provide a comprehensive review of all CMP audit violations imposed within the same audit year. A link to the webpage is provided.
Action	Informational to PACE. Refer to the memo for complete details on the CMP for 2019 program audits.
CMS Email Title & Release Date	Correction to the HPMS Memo titled “Civil Money Penalty Enforcement Actions for 2019 Program Audits” – Dated 3/2/2020

Summary	CMS corrected an error in one of the audit scores initially reported in the memo released February 28, 2020.
Action	Informational to PACE. Refer to the memo for complete details on the CMP for 2019 program audits.
CMS Email Title & Release Date	Part D Medication Therapy Management Program Improvements - Standardized Format - 60 day Comment Period – Dated 3/3/2020
Summary	CMS requested comments on proposed revisions to the Part D Medication Therapy Management (MTM) Program Standardized Format for the Comprehensive Medication Review (CMR) summary. Comments on the proposed rule related and non-rule related revisions must be received by April 6, 2020 and April 24, 2020 , respectively, per instructions in each notice. Links to the notices are provided.
Action	Informational to PACE as PACE is waived of the requirements of the Medication Therapy Management Program.

Important Date Reminders

Date	Item
June 29, 2020 11:59 PM ET	Deadline for 2019 PDE Submissions
June 30, 2020 11:59 PM PT	Deadline for 2019 Direct & Indirect Remuneration (DIR) Submission
<i>*Subject to change, forthcoming information to be release by CMS.</i>	

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