

~ Updates on HPMS Memos ~

CMS Memo Title & Release Date	Release of the Coverage Gap Discount Program 2015 Benefit Year Closeout Invoice Reports – Dated 5/15/2020
Summary	CMS announced the release of the Coverage Gap Discount Program 2015 Benefit Year Closeout Invoice Reports for manufacturers and Part D sponsors. The 2015 Benefit Year Closeout Invoice Reports will be released on July 16th, 2020 and include data from benefit years 2013, 2014 and 2015.
Action	Informational to PACE as PACE participants are not eligible to participate in the Coverage Gap Discount Program.
CMS Memo Title & Release Date	2020 Call Center Monitoring and Performance Metrics for Timeliness Study, Quarter 1 – Dated 5/15/2020
Summary	The following two data sets for the 2020 Performance Metrics for Accuracy and Accessibility Study will be available for plans to review within the next few days in HPMS: <ul style="list-style-type: none"> • Call center timeliness performance metrics data • Call-level raw data Instructions for accessing the data is provided.
Action	Informational to PACE as PACE does not follow the Medicare Advantage Prescription Drug marketing guidelines.
CMS Email Title & Release Date	Registration: Risk Adjustment for EDS and RAPS User Group – Dated 5/18/2020
Summary	CMS will host a user group presentation on Risk Adjustment for Encounter Data System and Risk Adjustment Processing System on May 28th, 2020 . Individuals interested in participating are asked to register by May 22nd, 2020 .
Action	Informational to PACE. Refer to the email for complete details.
CMS Memo Title & Release Date	Medicare Beneficiary Identifier (MBI) Plan Lookup Tool – Dated 5/19/2020
Summary	CMS made available a secured web based MBI Plan Lookup tool in MARx. The tool will provide plans the ability to obtain a participant’s MBI for enrollment purposes.
Action	Applicable to PACE. Refer to the memo for complete details on the MBI Plan Lookup tool.

CMS Email Title & Release Date	Updated Employer Group Waiver Plan Guidance for Medicare Advantage Organizations – Dated 5/19/2020
Summary	CMS waived the requirement in which Medicare Advantage (MA) organizations offering an EGWP no longer must offer an MA plan of the same type for individual Medicare enrollment under the same contract.
Action	Informational to PACE.
CMS Memo Title & Release Date	Contract Year 2021 Part C Bidding and Benefits Instructions Related to COVID-19 – Dated 5/19/2020
Summary	CMS provided information to plans on how to prepare the CY 2021 BPT and PBP as it relates to COVID-19 and during a federal or state public health emergency.
Action	Applicable to PACE. Refer to the memo for complete details.
CMS Memo Title & Release Date	Part D Senior Savings Model Calendar Year 2021 Model Application and Bid Submission – Dated 5/21/2020
Summary	CMS provided additional guidance on the CY 2021 bid submission for plans that applied to participant in the Part D Senior Savings Model. In addition, the plans must complete the list of items mentioned to finalize participation in the Model through their Part D bid submission by June 1st, 2020 at 11:59 PDT .
Action	Informational to PACE.
CMS Memo Title & Release Date	2020 Performance Measure Validation Requirements for Medicare-Medicaid Plans – Dated 5/21/2020
Summary	CMS will perform the 2020 Performance Measure Validation (PMV) cycle for ongoing performance measure validation of select core and state-specific measures to ensure the reported data are reliable, valid. Complete, and comparable among Medicare-Medicaid Plans.
Action	Informational to PACE. Refer to the email for complete details.
CMS Memo Title & Release Date	Updated Contract Year (CY) 2021 Final Part D Bidding Instructions – Dated 5/22/2020
Summary	CMS announced an update to the recent CY 2021 Part D bid submission and instructions on the Annual Eligibility Threshold for Medication Therapy Management Programs and the Minimum Specialty Tier Eligibility Threshold for CY 2021. For 2021, the MTM program annual cost threshold is \$4,376 and the specialty tier threshold is \$670 as a 30-day equivalent negotiated price.

Action	Applicable to PACE plans who has a formal MTM program and utilizes a formulary.
CMS Memo Title & Release Date	2021 Medication Therapy Management Program Information and Submission Instructions – Dated 5/22/2020
Summary	CMS provided guidance to plans regarding the CY 2021 Medication Therapy Management Programs on the important dates, changes and information regarding submission and attestations.
Action	Informational to PACE as PACE is waived of the requirements of the Part D Medication Therapy Management Program.
CMS Memo Title & Release Date	Information Related to Coronavirus Disease 2019 – COVID-19 – Dated 5/22/2020
Summary	CMS added guidance regarding the temporary permissive action for waiver of Part D cost sharing as it relates to COVID-19.
Action	Informational to PACE. Refer to the memo for items that are applicable to your plan.
CMS Memo Title & Release Date	Contract Year (CY) 2021 Initial Actuarial Certification Deadline – Dated 5/28/2020
Summary	As part of the CY 2021 bid submission requirements, an actuarial certification must be submitted via the HPMS actuarial certification module for every Bid Pricing Tool uploaded to HPMS. All initial certifications are to be completed by June 5th, 2020 . If a certification is not submitted via HPMS, the bid(s) will not be considered for CMS review or approval.
Action	Informational to PACE. PACE plans should review the status of this requirement with their respective actuaries.
CMS Memo Title & Release Date	Coverage Gap Discount Program: June Participating Labeler Code – Dated 5/28/2020
Summary	CMS will make the following updates to the list of participating manufacturer labeler codes effective June 1st, 2020 . Added: 55135 Immunomedics, Inc. 72512 Averitas Pharma
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.

For the latest CMS response to COVID-19, please visit the CMS.gov website.

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
July 31, 2020	Deadline for 2015-2018 Direct & Indirect Remuneration (DIR) Resubmission
September 30, 2020 1 PM ET	Deadline for Part D Payment Reconciliation Reopening for CY 2015 PDE Data Submission
<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.