

~ Updates on HPMS Memos ~

<b>CMS Memo Title &amp; Release Date</b>	Reporting Unique Routing Values for Part D Plans - Dated 9/10/2020
<b>Summary</b>	The purpose of this memorandum is to provide instructions to Part D plans for populating unique routing identifier (BIN/PCN) values within the Health Plan Management System. CMS has recently discovered errors in the BIN/PCN data and is asking plans to correct the HPMS information in advance of the next data extract scheduled for <b>October 2020</b> . Directions are included in the memo.
<b>Action</b>	Applicable to PACE. Refer to memo for complete details.
<b>CMS Memo Title &amp; Release Date</b>	Designation of Enterprise Identity Management (EIDM) Plan User Approver/External Point of Contact (EPOC) - ACTION -Dated 9/11/2020
<b>Summary</b>	This letter describes the requirements and process that Medicare Advantage Organizations and Prescription Drug Plans must use to designate staff that will be responsible for granting access to data in the CMS systems, as well as the responsibilities of a MAO/PDP CMS External Point of Contact.
<b>Action</b>	Applicable to PACE. Refer to memo for complete details.
<b>CMS Memo Title &amp; Release Date</b>	Advance Notice of Methodological Changes for Calendar Year (CY) 2022 for Medicare Advantage (MA) Capitation Rates and Part C and Part D Payment Policies – Part I, CMS-HCC Risk Adjustment Model - Dated 09/14/2020
<b>Summary</b>	For CY 2022, CMS is proposing to fully phase in the HCC model first implemented for CY 2020. CMS uses this model to calculate encounter data-based risk scores. Under the CY 2022 proposal, CMS will calculate 100% of the risk score using the 2020 CMS-HCC model
<b>Action</b>	Informational to PACE. Refer to memo for complete details.
<b>CMS Memo Title &amp; Release Date</b>	2019 Part C and Part D Program Audit and Enforcement Report - Dated 09/14/2020
<b>Summary</b>	CMS release the 2019 Part C and Part D Program Audit and Enforcement Report. The report summarizes information about program audits conducted in 2019 by CMS. CMS is looking for feedback on the report which is attached to the email and will be made available on the link provided for Part C and Part D Compliance and Audits. A separate PACE audit report for PACE audits conducted in 2020 will not be issued as CMS is continuing to refine it by collecting and analyzing data and feedback from audited PACE plans.
<b>Action</b>	Informational to PACE. Refer to the attached report for information on the program audits conducted by CMS.

<b>CMS Memo Title &amp; Release Date</b>	Programs of All-Inclusive Care for the Elderly (PACE) COVID-19 Frequently Asked Questions - Dated 09/15/2020
<b>Summary</b>	This document provides frequently asked questions and answers pertaining to PACE during the COVID-19 Outbreak.
<b>Action</b>	Applicable to PACE. Refer to memo for complete details.
<b>CMS Memo Title &amp; Release Date</b>	Contract Year 2021 Annual Notice of Change and Evidence of Coverage Submission Requirements and Yearly Assessment - Dated 09/15/2020
<b>Summary</b>	CMS remind plans on the key actions required for the Annual Notice of Change/Evidence of Coverage (ANOC/EOC) documents. The ANOC/EOCs provide vital information to enrollees regarding benefits and cost-sharing. CMS expect plans to send corrected ANOC/EOCs to enrollees on time and in accordance with Medicare guidelines. Additional information and deadlines regarding the ANOC/EOC document and errata submission are included.
<b>Action</b>	Informational to PACE as PACE is waived of the ANOC/EOC requirements. Refer to the memo for complete details.
<b>CMS Memo Title &amp; Release Date</b>	End-of-Year 2020 Enrollment and Payment Systems Processing Information - Dated 09/17/2020
<b>Summary</b>	CMS provided information to support plans in their end-of-year enrollment and payment systems processing activities to ensure a successful transition to CY 2021 regarding: <ol style="list-style-type: none"> <li>1. Medicare Advantage &amp; Prescription Drug (MARx) System Transaction Processing;</li> <li>2. Rollover and Terminating Plan MARx Transaction Processing; and Plan Reports and System User Interface (UI) Availability</li> </ol>
<b>Action</b>	Applicable to PACE. Refer to the memo for items that may be applicable to your plan and take the appropriate actions as needed.
<b>CMS Memo Title &amp; Release Date</b>	Announcement of the October 2020 Software Release - Dated 09/18/2020
<b>Summary</b>	This letter provides information regarding the planned release of systems changes scheduled for October 2020. The update described in this communication will be included in the upcoming Plan Communications User Guide scheduled for the end of October 2020.
<b>Action</b>	Applicable to PACE. Refer to memo for complete details.

<b>CMS Memo Title &amp; Release Date</b>	Non-Contract Provider Access to Medicare Administrative Appeals Process - Dated 9/18/2020
<b>Summary</b>	The purpose of this memorandum is to remind Medicare Advantage organizations of the applicability of the administrative appeals process if a noncontracted provider who has furnished a service to an enrollee requests reconsideration of an organization determination.
<b>Action</b>	Informational to PACE. Refer to memo for complete details.
<b>CMS Memo Title &amp; Release Date</b>	2021 Timeliness Monitoring Project (TMP) - Dated 09/18/2020
<b>Summary</b>	CMS will conduct an industry-wide monitoring project in 2021, collecting data to evaluate the timeliness of processing of Medicare Advantage (Part C) reconsiderations. This memorandum provides operational and technical instructions regarding the submission requirements for this data collection.
<b>Action</b>	Refer to memo for complete details.
<b>CMS Memo Title &amp; Release Date</b>	Announcement of the October Encounter Data Software Release Updates - Dated 09/18/2020
<b>Summary</b>	CMS continues to implement software improvements to the systems related to accepting and processing encounter data to support the Medicare Advantage program. Currently, five reject edits will be deactivated (17330,18300,18305,18310,21980). These changes will be implemented on <b>October 30, 2020</b> .
<b>Action</b>	Applicable to PACE. Refer to memo for complete details.
<b>CMS Memo Title &amp; Release Date</b>	Attestation of Prescription Drug Event (PDE) Data and Direct and Indirect Remuneration (DIR) Data related to the 2015 Reopening - Dated 9/18/2020
<b>Summary</b>	The purpose of this memo is to remind Part D sponsors to sign the <i>Attestation of Data Relating to CMS Payment to a Medicare Part D Sponsor</i> . The attestation will be available through the Health Plan Management System on <b>November 2, 2020</b> . Part D sponsors must electronically sign the attestation in HPMS by <b>noon ET, November 9, 2020</b> .
<b>Action</b>	Applicable to PACE. Refer to memo for complete details.

<b>CMS Memo Title &amp; Release Date</b>	Deadline for Submitting Risk Adjustment Data for Use in RiskScore Calculation Runs for Payment Years 2020, 2021, and 2022 - Dated 09/18/2020
<b>Summary</b>	This memo is a reminder of upcoming deadlines to submit risk adjustment data for use in calculating risk scores for Payment Years 2020, 2021 and 2022. All Risk Adjustment Data and Encounter Data included in the chart will need to be submitted by <b>8pm ET of the dates specified</b> on the memo.
<b>Action</b>	Applicable to PACE. Refer to memo for complete details.
<b>CMS Memo Title &amp; Release Date</b>	Contract Year 2021 Translated Model Materials Requirements and Language Data Analysis Methodology – Dated 09/18/2020
<b>Summary</b>	CMS reminds plans that they must translate materials into any non-English language that is the primary language of at least 5 percent of the individuals in a plan benefit package (PBP) service area. CMS has prepared a file to assist. Instructions to locate the data and a path to the HPMS Material Language Lookup module are provided.
<b>Action</b>	Applicable to PACE. Refer to memo for complete details.
<b>CMS Memo Title &amp; Release Date</b>	Non-Contract Provider Access to Medicare Administrative Appeals Process - Dated 09/23/2020
<b>Summary</b>	The purpose of this memo is to remind organizations of the administrative appeals process if a noncontracted provider requests reconsideration of determination.
<b>Action</b>	Applicable to PACE. Refer to memo for complete details.
<b>CMS Email Title &amp; Release Date</b>	Seasonal Influenza Vaccination Reminder - Dated 09/24/2020
<b>Summary</b>	This is a reminder from CMS encouraging plans to have a communications strategy to address how their enrollees may access the influenza vaccine. Links with additional material are included in the email.
<b>Action</b>	Applicable to PACE. Refer to memo for complete details.
<b>CMS Memo Title &amp; Release Date</b>	Revised Appeal and Grievance Data Form, Form CMS-R-0282 - Dated 09/24/2020
<b>Summary</b>	CMS has revised the OMB-approved standardized Appeal and Grievance Data Form (Form CMS-R-0282). Organizations should begin using the revised Appeal and Grievance Data Form as soon as possible but <b>no later than November 16, 2020</b> .
<b>Action</b>	Refer to memo for complete details.

<b>CMS Memo Title &amp; Release Date</b>	Medical Loss Ratio Data Form and Attestation Submission Reminder for Contract Year 2019 - Dated 09/24/2020
<b>Summary</b>	CMS has released this memo to serve as a reminder of the CY 2019 MLR timeline. The upload functionality MLR data forms will be available in HPMS beginning <b>November 6, 2020</b> . These data forms must be submitted in HPMS by <b>11:59 PM PT on Friday, December 4, 2020</b> . The pathway and instructions for submitting can both be find within the memo.
<b>Action</b>	Informational to PACE as the MLR provision does not apply to PACE.
<b>CMS Email Title &amp; Release Date</b>	CMS Announces Historically Low Medicare Advantage Premiums and New Payment Model to Make Insulin Affordable Again for Seniors - Dated 09/24/2020
<b>Summary</b>	CMS announced that the average Medicare Advantage Premium will be the lowest in 14 years for beneficiaries projected to enroll in a MA plan for 2021. Additionally, seniors who use insulin will have over 1,600 Medicare Advantage and Part D prescription drug plans to choose from that will offer insulin at no more than a \$35 monthly copay beginning in January.
<b>Action</b>	Informational to PACE. Refer to memo for complete details.
<b>CMS Memo Title &amp; Release Date</b>	Non-Renewal and Service Area Reduction Guidance and Enrollee Notification Models - Dated 09/24/2020
<b>Summary</b>	CMS provided guidance for Medicare Advantage Organizations (MAOs) and Prescription Drug Plan (PDP) sponsors on the process for notifying enrollees in plans that are non-renewing or reducing their service areas for contract year (CY) 2021. Model notices for enrollees are attached.
<b>Action</b>	Informational to PACE. Refer to the memo for complete details.
<b>CMS Memo Title &amp; Release Date</b>	Medicare Advantage/Prescription Drug System (MARx) October 2020 Payment – INFORMATION - Dated 09/25/2020
<b>Summary</b>	CMS provided information about the October payment scheduled for <b>October 1, 2020</b> , and may require plan action for the following: <ul style="list-style-type: none"> <li>• Important Notice Regarding ESRD Payment Cases</li> <li>• Sequestration Suspension Period</li> <li>• Changes to MARx Plan Transaction Processing</li> </ul>
<b>Action</b>	Applicable to PACE. Refer to the memo for complete details and items that may be applicable to your plan.
<b>CMS Memo Title &amp; Release Date</b>	2021 Reassignment of Low-Income Subsidy Beneficiaries in Non-Renewing Medicare Advantage Plans and Medicare Advantage Plans Reducing their Service Areas - Dated 09/25/2020
<b>Summary</b>	In October, CMS will conduct reassignment of beneficiaries eligible for LIS who are enrolled in certain Medicare Advantage plans. CMS will reassign only individuals who are LIS-eligible in 2020 and 2021; also if they are enrolled in a MA plan that will be non-renewing or has a service area reduction.

<b>Action</b>	Informational to PACE. Refer to the memo for additional information and detail on the process in the event that such reassignment affects your participants.
<b>CMS Memo Title &amp; Release Date</b>	2021 Reassignment of Low-Income Subsidy Beneficiaries in Prescription Drug Plans - Dated 09/25/2020
<b>Summary</b>	<p>CMS will reassign individuals who are LIS-eligible in 2020, will remain LIS-eligible in 2021, and--</p> <ol style="list-style-type: none"> <li>1. Have remained in the PDP into which CMS originally assigned them, but their current PDP will no longer have a Part D premium at or below the LIS benchmark in 2021 (excluding the PDPs that volunteer to waive the de minimis amount); or,</li> <li>2. Are enrolled in a PDP that will be non-renewing, regardless of whether they chose or were assigned to the PDP.</li> <li>3. Are in MA plans that are non-renewing or reducing their service area as of 2021. LIS-eligible beneficiaries in non-renewing MA plans or beneficiaries affected by a service area reduction are reassigned into PDPs only. Additional information about the reassignment process for qualifying beneficiaries in MA plans that are non-renewing or reducing their service area will be provided in separate guidance.</li> </ol>
<b>Action</b>	Informational to PACE. PACE organizations should review the memo for items that may be applicable in the event such reassignment affects your participants.

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

**Important Date Reminders**

<b>Date</b>	<b>Item</b>
September 30 <sup>th</sup> , 2020 1 PM ET	Deadline for the Reopening for Calendar Year 2015 PDE Data Submission
November 9 <sup>th</sup> , 2020 12 PM ET	Deadline for the submission of the <i>Attestation of Data Relating to CMS Payment to a Medicare Part D Sponsor</i> .
*Subject to change, forthcoming information to be release by CMS.	

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.