

**Summary of HPMS Releases**  
For the week ending November 28, 2008

**Title: Guidance on Coordination of Benefits (COB) File Interpretation**

**Date: 11/24/08**

**Summary:** This memo provides additional guidance to Part D sponsors regarding the interpretation, usage and availability of information contained within the coordination of benefits (COB) file. Part D sponsors and States have been reporting either delayed or inaccurate COB information when a pharmacy submits a Part D claim for processing. After reviewing individual cases, CMS has found that Part D sponsors are not processing the COB files correctly, resulting in a delay of the correct payer information being applied at the pharmacy or point-of-sale. The purpose of this memorandum is to ensure all Part D sponsors are processing the COB file correctly.

**Title: Changes to Part D Reporting Requirement – LTC Pharmacy Rebate Data**

**Date: 11/24/08**

**Summary:** The Centers for Medicare and Medicaid Services (CMS) has been collecting long-term care (LTC) pharmacy rebate data from Part D sponsors since January 2007. Because we do not believe that the data currently collected via the 2008 Part D Reporting Requirements are the most effective tools for assisting sponsors in accomplishing this goal, we are suspending the collection of these data for CY2008 and CY2009. Instead, we believe we can more effectively achieve our end goal of focusing plan attention on network LTC pharmacy the Paperwork Reduction Act (PRA)'s approval process of the CY2010 Part D reporting requirements, CMS is expecting to propose the data reflected in Attachment A to be collected on an annual basis.

**Title: Processing Low Income Subsidy Status Changes for 2009**

**Date: 11/24/08**

**Summary:** The purpose of this memo is to provide information about the forthcoming Loss of Subsidy Data File that contains important about members who will lose low income subsidy (LIS) eligibility for 2009. This memo also describes the actions Part D Sponsors are required to take once they receive this information, including setting members' low income cost sharing (LICS) level effective January 1, 2009, and notifying them of these changes.

**Title: Reminder on Long-Term Care Pharmacy Contracting**

**Date: 11/25/08**

**Summary:** The purpose of this communication is to remind Part D sponsors of the requirement to (1) provide convenient access to network long-term care (LTC) pharmacies to all of their enrollees residing in LTC facilities, and (2) excluding payment for drugs the are covered under a Medicare Part A stay that would otherwise satisfy the definition of a Part D drug.

**Title: Selection of Independent Review Entity for Private Fee-for-Service Organizations**

**Date: 11/25/08**

**Summary:** This memo announces First Coast as the PFFS payment dispute contractor between PFFS plans and deemed providers. This contractor will begin accepting these payment disputes on January 1, 2009.

**Title: Required Inclusion of Balance Billing Notification in the 2009 Evidence of Coverage**

**Date: 11/25/08**

**Summary:** This memo informs PFFS plans that allow balance billing to update the EOC and/or send an erratum to inform members of the balance billing and the potential impact it would have on cost-sharing.

**Title: Issuance of Updated Low Income Subsidy Rider**

**Date: 11/25/08**

**Summary:** The purpose of this memo is to inform you of the LIS Rider with updates due to MIPPA changes and updated plan instruction.

**Title: Reporting Creditable Coverage Information for Former Plan Members**

**Date: 11/26/08**

**Summary:** The purpose of this memorandum is to clarify our previous instructions for reporting information about creditable coverage for former plan members. We outline how plans are to submit a new number of uncovered months on behalf of former plan members and how to adjust the number of uncovered months submitted during a current plan member's prior enrollment period.

**Title: Continuation of the Low Income Subsidy Match Rate Project**

**Date: 11/26/08**

**Summary:** This memo is to inform Part D sponsors that CMS will continue the LIS match rate project for the 2009 benefit year and Acumen, LLC will continue to assist CMS and Part D sponsors in this process.