

CENTER FOR MEDICARE

DATE: February 1, 2011

TO: Medicare Advantage Organizations
Medicare Advantage-Prescription Drug Organizations
Cost-Based Contractors
Prescription Drug Plan Sponsors
Employer/Union-Sponsored Group Health Plans

FROM: Danielle Moon, J.D., M.P.A.
Director, Medicare Drug & Health Plan Contract Administration Group

RE: Issuance of Draft CY 2012 Annual Notice of Change and Evidence of Coverage
for Public Comment

We are releasing the draft CY 2012 Annual Notice of Change (ANOC) and Evidence of Coverage (EOC) templates with a two week comment period. We are pleased to announce that we have created a template for Dual Eligible Special Need Plans (SNPs) to better accommodate the unique features of this plan type. Additionally, we included specific language for Chronic Care and Institutionalized SNPs in the Medicare Advantage Prescription Drug Plan ANOC/EOC template. We developed the template and separate language through several rounds of consumer testing and listening sessions with SNP representatives and consumer advocates.

In an effort to continuously update and improve marketing materials, our changes to existing ANOC/EOC templates for CY 2012 serve to clarify existing language and incorporate recent policy issuances. We have also made minor editorial and plain language changes throughout the templates.

In order to facilitate review of changes to the ANOC/EOC, we provide a high-level summary of significant changes below.

Changes to all ANOC/EOC Templates:

- In ANOC, revised language related to passive enrollments to indicate beneficiaries will be switched to a new plan.
- In ANOC, added a section for plans to describe administrative changes impacting members.
- In both ANOC and EOC, revised language to reflect new AEP dates.
- In both ANOC and EOC, added an introductory section describing the type of plan in which the beneficiary is currently enrolled.
- In both ANOC and EOC, revised language related to the Part D income-related monthly adjustment amount (IRMAA).
- In EOC, revised definitions throughout template.

Changes to all MA and Cost Plan Templates:

- In ANOC, revised language related to maximum out-of-pocket (MOOP) thresholds (not applicable to MSA plans).
- In ANOC, revised language related to coverage for preventive services.
- In EOC, added language to describe rules for ownership of durable medical equipment.
- In EOC, revised language about MOOP and included a section for plans to describe service category MOOPs.
- In EOC, added language to describe balance billing.
- In EOC, added service categories to the Medical Benefits Chart; specifically, cardiac rehabilitation services, pulmonary rehabilitation services, kidney disease education services, diabetes screening, smoking cessation.
- In EOC, revised service categories within the Medical Benefits Chart.
- In EOC, revised language regarding visitor/traveler benefits (not applicable to MSA plans).
- In EOC, added language related to the new Medicare Advantage Annual Disenrollment Period.

Changes to Part D Templates:

- In ANOC, revised information related to changes in out-of-pocket costs.
- In EOC, added alternate text for plans in U.S. territories to replace description of LIS.
- In EOC, revised and expanded information about the Medicare Coverage Gap Discount Program.
- In EOC, added information describing IRMAA.

Changes to Cost Plan Template:

- In EOC, revised language to reflect members should use Medicare card when receiving out-of-network services.
- In EOC, revised language describing when a member can disenroll.

Changes to MSA Plan Template:

- In ANOC, added a section for plans that are changing the MSA trustee.
- In both ANOC and EOC, removed instructions for MSA demonstration plans.

Changes to PFFS Plan Template:

- In EOC, added language regarding member's right to a coverage decision when using out-of-network providers.

Changes to MAPD Plan Template:

- In both ANOC and EOC, removed instructions for DE SNPs, as DE SNPs now have their own specific template.
- In EOC, revised language regarding eligibility criteria for C-SNPs and I-SNPs.
- In EOC, provided alternative text for I-SNPs to reflect members' eligibility for an SEP.

The templates are available on the CMS Marketing Models Web page located at:

http://www.cms.gov/ManagedCareMarketing/09_MarketngModelsStandardDocumentsandEducationalMaterial.asp

The deadline for comments is February 15th, 2011. Comments received after this date may not be considered for this update. Please submit all comments using the attached Excel spreadsheet via email to MarketingPolicy@cms.hhs.gov with "Comments ANOC/EOC Templates" in the subject line of the email. We thank you in advance for your careful review and comments on these templates. If you have additional questions about the content of this memorandum, please contact your account manager.