#### DEPARTMENT OF HEALTH & HUMAN SERVICES Centers for Medicare & Medicaid Services 7500 Security Boulevard, Mail Stop 00-00-00

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CENTER FOR MEDICARE



**DATE:** December 04, 2019

**TO:** All Prescription Drug Plans, Medicare Advantage - Prescription Drug Plans,

Section 1876 Cost Plans, Medicare-Medicaid Plans, and PACE plans

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**SUBJECT:** UPDATES – 2020 Medicare Part D Overutilization Monitoring System

Technical Guidance

This memorandum announces the release of updated Overutilization Monitoring System (OMS) technical guidance for 2020 Medicare Part D drug management programs (DMPs).

To access the OMS, you must be an authorized user of the Patient Safety Analysis Web Portal. The access authorization process is described later in this memo. Requests for new user authorization to access the 2020 OMS Reports must be received no later than January 24, 2020. Instructions can be found beginning on page 2 of this memorandum.

Note: PACE plans with a DMP are not exempt from the OMS reporting. PACE plans should assign authorized users of the Patient Safety Analysis Web Portal if, not already done.

## Updated 2020 OMS Technical Guidance

The updated OMS technical guidance can be found on the <u>Patient Safety Analysis Web Portal</u> and on <u>CMS Part D Overutilization website</u>. Revisions and clarifications were made based on experience with OMS reporting in 2019 and questions from Part D sponsors. The materials apply to the next quarterly OMS Reports available on January 31, 2020.

### The updates include the following:

- Revised the Health Insurance Claim Number (HICN) field. HICN is no longer reported or captured in any reports. Report layouts did not change. Data entry to the HICN field is blocked.
- Added Medicare Advantage encounter data to identify beneficiaries with exemption diagnosis codes such as cancer and palliative care.
- Modified suppression rule for 'Review in Progress' responses to close cases that no longer meet the OMS Minimum Criteria during the current measurement period.

- Clarified in the User Guide that the two palliative care outpatient claims are on different dates of service.
- Added clarifications to the following response descriptions in the User Guide:
  - o J. Reason Coverage Limitation Unnecessary 'Wait and See' (O1).
  - o K. Exceptions -- K6, K7 and K9.
  - E. Review Status -- 'Review in Progress' (R1) for both the OMS Response Form (ORF) and Sponsor Response Form (SRF).

# OMS Report Package Availability

Sponsors will receive an email when their quarterly Overutilization Monitoring Report Package is available for download. The email will indicate which contracts have detail-level reports including OMS-identified potential at-risk beneficiary cases from the current or previous reporting periods. Instructions for downloading the Overutilization Monitoring Package of reports and submitting responses to the OMS are available in the Overutilization Monitoring System User Guide available on the Patient Safety Web Portal under Help Documents. The deadline for submitting responses is 30 days after the report date.

# **OMS Response Forms Validation**

As a reminder, once the response forms are uploaded, view the Process Status on the Upload File History page to confirm the upload was successful. If the upload was successful, the Process Status reads "Form(s) processed".

# Access to the Patient Safety Analysis Web Portal

To access the Overutilization Monitoring Reports, you must be an authorized user of the Patient Safety Analysis Web Portal and implement a DMP. CMS' contractor, Acumen, LLC, currently manages the Patient Safety Analysis Web Portal. The Web Portal is accessible only to authorized participants, with each sponsor utilizing a secure space on the site that is separate from all other sponsors.

Only the Medicare Compliance Officer (MCO) for a given contract may authorize user access to Acumen's Patient Safety Web Portal for that contract. To streamline this process, Acumen developed the User Security Web Portal – a web tool that allows MCOs to manage their users on the Acumen Web Portals.

To complete User Authorization, the MCO must:

- 1. Identify individuals who require access to the Patient Safety web portal for each contract.
  - a. Contracts are limited to **five** authorized users.
  - b. All authorized web portal users will have the ability to view all contract-specific portal content and transfer data for their designated contract and permission level.

- c. All authorized web portal users will also be able to discuss any data concerns with Acumen and CMS through contract-specific discussion boards.
- 2. Log on to the User Security Web Portal.
- 3. Complete the Add User steps to designate users and authorize access permissions.

## Accessing the User Security Web Portal

Access to the Patient Safety Web Portal is managed by each contract's MCO through <u>Acumen's User Security Web Portal</u>. The latest MCO on record for each contract in HPMS has been granted access to the User Security Web Portal.

- If your MCO already has an Acumen ProgramInfo web portal account, he/she may log in to the User Security Web Portal using the same username and password.
- If your MCO does not have an Acumen ProgramInfo web portal account, your contract must update your MCO's contact information in HPMS to reflect the appropriate individual. Acumen will then disseminate login credentials to the updated MCO.

To access the User Security Web Portal:

- 1. Navigate to the Web Portal.
- 2. Agree to the Warning Notice.
- 3. Enter your username and login password.

# Designating Users and Authorizing Access Permissions

After your organization's MCO logs in to the User Security Web Portal, he/she must review and/or update the current user access settings, or authorize access permissions for new users. Each contract is limited to a maximum of five users on the Patient Safety Web Portal.

- If your contract is continuing from CY 2019, your MCO must log in to the User Security Web Portal to review the list of individuals currently authorized to access your contract's information on the Patient Safety Web Portal. Your MCO may choose to keep the same user access settings or modify access as necessary.
- If your contract is new in CY 2020, your MCO must log in to the User Security Web Portal to add new users and authorize access permissions or choose to authorize existing users to access your contract's information.

To designate users and authorize access permissions, MCOs must complete the following steps through the User Security Web Portal:

Add an existing and/or new user.

- 1. Select the Web Portal and contract(s) for each user.
- 2. Authorize access permissions for each user.

MCOs may also designate themselves as one of the five authorized users on the Patient Safety Web Portal.

All authorized users can log on to navigate the Web Portal and receive email notifications regarding report releases. However, access to the Patient Safety Analysis Web Portal can vary according to two possible access levels for each user:

- Summary Report Only: User can access a version of the Overutilization Monitoring Reports with summary information on contract-level data for each Overutilization Issue Type. Users with Summary Report Only permissions will not be able to access beneficiary-level data.
- Summary and Confidential Beneficiary Reports: User can access confidential beneficiary-level information in the detail version of the Overutilization Monitoring Reports, in addition to the summary versions of the Overutilization Monitoring Reports.

At least one user from each contract must have access to Summary and Confidential Beneficiary Reports in order to view and respond to beneficiary-level overutilization issues.

Important Date: To ensure timely access to the Web Portal and the January OMS reports, Medicare Compliance Officers must complete all steps of the user authorization process by January 24, 2020.

If a Part D sponsor has difficulty accessing the Web Portal or receives an error message because the contract ID is not listed in the Web Portal, please contact CMS at <a href="PartD\_OM@cms.hhs.gov">PartD\_OM@cms.hhs.gov</a> or Acumen at <a href="PatientSafety@AcumenLLC.com">PatientSafety@AcumenLLC.com</a>. Please include in the email the contract ID.

Following the user authorization process, Acumen will send the following to each newly authorized Patient Safety Analysis Web Portal user:

- A Welcome Email with the Patient Safety Analysis Web Portal user guide and Web Portal URL.
- A Credential Email with a unique One-Time Password Link and login username.

#### Additional Resources

Medicare Part D DMP policy guidance, frequently asked questions, and other helpful information

MAPD Plan Communication User Guide (PCUG), including technical guidance for submitting DMP information to the MARX system

Questions about DMPs or general OMS questions should be sent to PartD OM@cms.hhs.gov

For technical questions related to the user authorization process or access to the website or OMS Reports, please contact Acumen at <a href="mailto:PatientSafety@AcumenLLC.com">PatientSafety@AcumenLLC.com</a> or by phone at (650) 558-8006.

Thank you for your continued dedication to helping our beneficiaries.