

MEDICARE DRUG & HEALTH PLAN CONTRACT ADMINISTRATION GROUP

DATE: August 5, 2019

TO: Medicare Advantage Organizations Medicare Advantage - Prescription Drug Organizations Section 1876 Cost Plans Prescription Drug Plan Sponsors Employer/Union-Sponsored Group Health Plans

FROM: Kathryn A. Coleman, Director

SUBJECT: HPMS Marketing Module Updates

The Centers for Medicare & Medicaid Services (CMS) will be updating the HPMS Marketing Module to streamline the material submission process outlined in the Medicare Communications and Marketing Guidelines (MCMG). This memorandum highlights the major changes to the Marketing Module, outlined below.

Material Code Updates

Retired Codes

CMS will be retiring codes that are not needed or not used. Many of these are for communication (non-marketing) materials, which do not need to be submitted into HPMS. The retired codes are outlined in the attached chart.

New Codes

There will be new codes for the following materials:

- Benefit highlights/snapshots, under code 4045. These are advertisements that typically include high-level summaries of plan benefits and/or cost sharing to entice or retain enrollment. HPMS submission is required if the material contains marketing content.
- CMS-requested communications, under category/code 11000. These are reserved exclusively for the submission of communication materials, as defined in section 20 of the MCMG, which CMS may request on an ad-hoc basis. Unless CMS indicates otherwise, no other materials may be submitted under this category.

Operational Clarifications/Updates

Standard Templates

To reduce submission burden, CMS is retiring all Final Expedited Review codes. Rather than requiring populated versions to be submitted within thirty days, CMS will require standard templates to be submitted with placeholders identifying all variable data (e.g., "<\$10 Copay/\$15

Copay/\$20 Copay>"). Spreadsheets may be used to list variable data if there are multiple PBPs. The spreadsheet must be submitted with the template using a zip file. Any changes must be resubmitted using the replacement functionality, which will be extended to codes previously associated with Final Expedited Review codes.

Additional SA/LIS

Plans should no longer use the Additional SA/LIS function to submit materials in HPMS. If there are multiple versions of a material for one PBP (e.g., Summary of Benefits), all versions must be submitted together in a zip file.

Direct Mail

CMS has noticed that materials (e.g., fliers, business reply cards, provider marketing) are being filed incorrectly as direct mail pieces, under code 4001. As a reminder, plans should not use this code when the material being submitted for review already has a specific designated submission code or does not require submission. Plans should focus on the content of the material rather than the mode of delivery.

Plan Comparison Indicator

There will be a new radio button for plans to indicate when materials include information about competitors, effective 8/9/19. This will be a required field when submitting new materials in HPMS, which will allow CMS to easily identify those materials.

Unless indicated otherwise, the above changes are effective August 19, 2019. Materials submitted in HPMS prior to this date will not be affected; plans do not have to resubmit them.

If you have any questions or would like to provide feedback, please email <u>Marketing@cms.hhs.gov</u>, and copy your Account Manager.

Attachment – Retired Codes

| Code | Description |
|------|--|
| 1019 | Errata - Summary of Benefits |
| 1020 | Errata - Formularies |
| 1059 | Notification of Availability of Electronic Materials |
| 1075 | Member Handbook |
| 1078 | Final Exp Rev - Member Handbook |
| 1080 | Provider/Pharmacy Directories |
| 1085 | Formularies |
| 1089 | Final Exp Rev - Enrollment Form and Related Docs |
| 1096 | Final Exp Rev - Cover Letter |
| 1097 | Enrollment Kit - Other documents. Note: Kits may still be used, but the documents |
| | within them must be submitted separately, as required, under the appropriate code. |
| 1130 | LIS Rider |
| 2070 | Disenrollment Forms |
| 2071 | Enrollment Notices |
| 2072 | Disenrollment Notices |
| 2073 | Reinstatement Notices. |
| 2074 | Acknowledgement Notices |
| 2076 | Failure to Pay Premium Notices |
| 2077 | Non-Renewal Notice |
| 2079 | Member Identification Card |
| 2080 | Employer/Union Plan Notices |
| 2081 | Other Enrollment/Disenrollment Notices |
| 2083 | Part C EOB |
| 2085 | Crosswalk Notice |
| 2087 | OEV Letters |
| 2090 | Multi-Plan Auxiliary Submission |
| 3032 | Other Claims/Appeals/Grievances Notices |
| 3033 | Grievance Notices |
| 3034 | Plan Appeal Notices |
| 3035 | Standardized OMB Claims/Appeals/Grievances Notices |
| 4011 | Scope of Sales Appointment Confirmation Form |
| 4021 | Final Exp Rev - Direct Mail Pieces with Benefit Information |
| 4022 | Final Exp Rev - Newspaper Ads with Benefit Information |
| 4023 | Final Exp Rev - Radio Ads with Benefit Information |
| 4024 | Final Exp Rev - TV/Internet Commercials & Other Videos w/Benefit Info |
| 4025 | Final Exp Rev - Billboard/Banner Ads with Benefit Information |
| 4027 | Final Exp Rev - Marketing Posters |
| 4029 | Final Exp Rev - Fliers with Benefit Information |
| 4033 | Final Exp Rev - Physician Advertising Materials/Additional Promotions |
| 4039 | Final Exp Rev - Social Media Posts |
| 4042 | Final Exp Rev - Pamphlets/Booklets |
| 5002 | Part D EOB |

| Code | Description |
|-------|---------------------------------------|
| 5015 | Utilization Management Notifications |
| 5017 | Excluded Provider Model Letter |
| 5018 | Prescription Transfer Letter |
| 5035 | Notice of Formulary Change |
| 5040 | Other Formulary/Drug Notices |
| 5043 | Multi-Plan Auxiliary Submission |
| 6007 | Non-Renewal Script |
| 6009 | OEV Script |
| 6012 | Final Exp Rev - Presentations/Scripts |
| 6017 | Other Scripts |
| 8022 | LEP/Creditable Coverage Notices |
| 10001 | LIS Letters |