



MEDICARE DRUG BENEFIT AND C & D DATA GROUP

DATE: February 2, 2017

TO: Medicare Compliance Officers, Part C and D Sponsors

FROM: Amy Larrick Chavez-Valdez, Director, Medicare Drug Benefit and C & D Data Group

SUBJECT: Simulations for Proposed Changes to the Beneficiary Access and Performance (BAPP) Measure for the C and D Star Ratings

In the 2018 Draft Call Letter, CMS proposes to modify how Civil Money Penalties (CMPs) are used to calculate the BAPP measure for the Medicare Parts C and D Star Ratings. CMS developed contract-level BAPP simulations based on the proposals and is making them available in the Health Plan Management System (HPMS) for informational purposes during the review of the 2018 Draft Call Letter. The simulations rely on the data used for the 2017 Star Ratings and thus, the 2015 measurement year.

The simulations employ the revised methodology detailed in the November 10, 2016 Request for Comments HPMS memo¹ as Option 1 and result in the same deduction for each contract held by a parent organization cited in a CMP notice. The scaled CMP deduction per contract is based on a ratio of the unadjusted CMP amount to total enrollment of the cited contracts at the time of the enforcement action.

For the simulations, the ratio is converted to a deduction using the proposed values below:

Ratio	BAPP Deduction per Cited Contract in the CMP Notice
Under 5.00	10 points
5.00 to less than 10.00	20 points
10.00 to less than 15.00	30 points
15.00 and above	40 points

In addition, the simulations cap the total CMP-related deduction for a contract at 40 points.

Once the revised CMP portion of the BAPP measure is determined for the simulations, the 2017 deductions for the sanction and Compliance Activity Module (CAM) portion are incorporated.

¹ <https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovGenIn/PerformanceData.html>.

The BAPP measure score was converted to a measure-level star using the cut points in the table below.

1 Star	2 Stars	3 Stars	4 Stars	5 Stars
0, 10 or 20	30 or 40	50 or 60	70 or 80	90 or 100

In HPMS, each contract is provided the information detailed in the table below. The last column of the simulation page is the BAPP measure-level star for a contract.

Please note: The simulation does not reflect the proposed change in the time period for the BAPP measure. The change in the time period was not applied to allow a comparison of the revised BAPP measure to the 2017 Star Ratings received by a contract.

HPMS Field Label	Field Description
Contract Number	The contract number associated with the data
Organization Marketing Name	The name the contract markets to members
Contract Name	The name the contract is known by in HPMS
Parent Organization	The parent organization of the contract
Effective Date	The contract effective date
Contract Sanctioned	Was the contract under sanction during the data time frame (Yes/No)
Date Sanction Imposed	The date the sanction began (date sanction started if applicable, blank if not)
Date Sanction Lifted	The date the sanction ended (date sanction ended if applicable, blank if not)
CMP	Was the contract awarded a Civil Money Penalty (CMP) during the data time frame (Yes/No)
CMP Ratio	The ratio of the unadjusted CMP amount to total enrollment of the cited contracts at the time of the enforcement action
CMP Deduction	The deduction to be applied based on the calculated CMP Ratio
NONC	The count of Notices of Non Compliance issued during the data time frame
WLwoBP	The count of Warning Letters without Business Plan issued during the data time frame
WLwBP	The count of Warning Letters with Business Plan issued during the data time frame
Ad-hoc CAPs	The count of Ad-hoc CAPs issued during the data time frame
CAP Severities	The severity of each individual Ad-hoc CAP issued during the data time frame
Total Severity	The total severity of all the Ad-hoc CAPs issued during the data time frame

HPMS Field Label	Field Description
CAM Score	The final calculated CAM score
BAPP Score	The final calculated measure score
BAPP Star	The final measure-level star

Instructions for Accessing Preview Data

To access the simulation data in HPMS, select: “Quality and Performance,” then “Performance Metrics,” then “Star Ratings and Display Measures,” then “Star Ratings and Display Measure,” then “Star Ratings,” and then select “2017-Simulation” for the report period.

Please email comments or questions to the following mailbox:

PartCandDStarRatings@cms.hhs.gov.

Thank you for your continued commitment to ensure the success of the Medicare Advantage and Prescription Drug programs.