

DEPARTMENT OF HEALTH & HUMAN  
SERVICES Centers for Medicare & Medicaid  
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**Center for Medicare  
Medicare Plan Payment Group**

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**Date:** April 7, 2014

**To:** All Part D Plan Sponsors

**From:** Cheri Rice, Director  
Medicare Plan Payment Group

**Subject:** Guidance for the Part D Payment Reconciliation Reopening for Calendar Year 2009

Pursuant to 42 C.F.R. 423.346(a)(1), CMS will reopen the 2009 Part D payment reconciliation with Part D sponsors in the Fall of 2014. The reopening will include all Prescription Drug Event (PDE) data submitted and accepted for CY 2009 through 1:00 PM ET on September 29, 2014. For the reporting of any outstanding changes to the 2009 DIR data, CMS will open the gates in the Health Plan Management System (HPMS) for the resubmission of the 2009 DIR Reports for Payment Reconciliation from July 1, 2014 to July 30, 2014. **To be considered in the 2009 reopening, PDE data must be received by the September 29<sup>th</sup> deadline, and DIR data must be received by the July 30<sup>th</sup> deadline.** CMS will continue to accept PDE data after the September 29<sup>th</sup> deadline; however, this data will not be considered in the 2009 reopening.

As indicated in the January 6, 2014 Health Plan Management System (HPMS) memorandum titled, "Reconciliation PDE Exclusion Process", CMS will implement the reconciliation exclusion process for reopenings and will issue Part D Exclusion from Reconciliation Reports when releasing the Part D payment reconciliation reports for a reopening. The Part D Potential Exclusion Warning Reports that will be distributed in April 2014 will include PDE data for benefit year 2009 as well as benefit year 2013 data. The reports will include benefit year 2009 PDEs for beneficiaries retroactively disenrolled (no enrollment in any Part D plan on the date of service (DOS)), or DOS on the PDE is greater than 32 days after the beneficiary date of death but will not include benefit year 2009 PDEs for beneficiaries that were awarded Low Income (LI) Status retro-actively or beneficiaries with a loss of LI eligibility after the PDE was accepted. Although benefit year 2009 PDEs associated with LI status changes are not included in the report, sponsors are expected to make adjustments to PDEs, as appropriate, if LI status has changed since the time of PDE submission. Part D sponsors will receive another Part D Potential Exclusion Warning report for benefit year 2009 in August 2014. This report will only include benefit year 2009 data.

CMS will perform a program-wide reopening for benefit year 2009. As stated in the September 6, 2013 HPMS memorandum titled, "Final Guidance on the Reopening of Coverage Year

2008”, CMS will not conduct a reopening for any contract that has terminated and received a final settlement from CMS.

If CMS has questions about the reopening requests received or the 2009 Annual DIR reports, our Part D Reconciliation Support contractor, Acumen LLC (Acumen), will be in contact with the Part D sponsor. If you are requesting a reopening, please file the reopening request with Acumen and use the format described in the May 8, 2008 HPMS memorandum titled, “The Part D Reopening Process and the Part D Appeals Process.”

Questions about the information in this guidance can be directed to Acumen at:

Acumen, LLC  
Attn: Part D Payment Support  
500 Airport Blvd., Suite 365  
Burlingame, CA 94010

[PartDPaymentSupport@acumenllc.com](mailto:PartDPaymentSupport@acumenllc.com)