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CENTER FOR MEDICARE

MEMORANDUM

DATE: February 16, 2012

TO: Medicare Compliance Officers, Part C & D Sponsors

FROM: Cynthia G. Tudor, Ph.D., Director, Medicare Drug Benefit and C & D Data Group

SUBJECT: Revisions to 2012 Plan Ratings: Measure: D15 - Part D Medication Adherence for Oral Diabetes Medications

CMS released the 2012 Part C and Part D Plan Ratings during last fall's open enrollment period. We have subsequently identified an issue, described below, that affects some contracts' data and star ratings in the Part D measure, D15 - Medication Adherence for Oral Diabetes Medications (DM-ADH).

This measure is defined as the percent of Medicare Part D beneficiaries 18 years or older who adhere to their prescribed drug therapy across four classes of oral diabetes medications: biguanides, sulfonylureas, thiazolidinediones, and DiPeptidyl Peptidase (DPP)-IV Inhibitors. Beneficiaries who only have one claim of a combination diabetes drug were erroneously included in this measure; one claim of a combination drug was incorrectly counted as two separate fills. As a result, the beneficiary was considered non-adherent when he/she should have been excluded. CMS' correction of this error resulted in improvements of some contracts' percentages. Moreover, no contracts' percentages decreased as a result of this correction. The majority of changes are less than 1 percentage point. These changes did not affect the star cut-points for this measure; that is they remain the same.

Of the 540 MA-PDs rated in this measure, 295 (55%) had an increase in their calculated DM-ADH percent, but only 21 (3.9%) had a change to the star rating for this measure. Of those 21 contracts, only 2 MA-PDs had a change to their overall rating. Of the 70 PDPs rated in this measure, 53 (76%) had an increase in their calculated DM-ADH percent; however, no contracts had a change to their star rating for this measure or their Part D summary rating.

Sponsors may view the updated data file in HPMS. Both the updated file and the fall 2011 file are posted.

Steps for accessing the updated Plan Ratings data in HPMS:

- To access the Part D Plan Ratings data, from the left navigation bar select: "Quality and Performance", then "Part D Performance Metrics and Reports", then "Part D Report Card Master Table" and then select either 2012 (original file) or 2012 V2 (updated file) for the report period.

Sponsors will have to compare these files to determine if changes were made to their data. A separate email will be sent via HPMS to the Medicare Compliance Officer for each contract that had a star rating increase in their diabetes adherence measure, Part D summary or

overall score. Some contracts had a DM-ADH percentage change that did not result in a change to their star ratings, and will not receive an alert.

CMS will be updating the Medicare Plan Finder in April 2012, and posting an updated Plan Ratings master table on cms.gov and data.gov. The MA-PDs with changes to their overall star rating will also be able to download updated marketing templates in HPMS.

In addition to the Plan Ratings changes, the CY2011 reports posted on the Patient Safety Analysis Website have already been updated to reflect this correction.

Comments or questions about this memo should be sent to PartDMetrics@cms.hhs.gov.

Thank you for your continued commitment to ensuring the success of the Medicare health and prescription drug programs.