



MEDICARE DRUG & HEALTH PLAN CONTRACT ADMINISTRATION GROUP

DATE: November 20, 2013

TO: All Medicare Advantage Organizations, including Special Needs Plans, Prescription Drug Plan Sponsors, and Section 1876 Cost Contractors that Offer Part D Operating in Contract Years 2013 and 2014

FROM: Danielle R. Moon, J.D., M.P.A., Director

SUBJECT: Contract Year 2014 Annual Notice of Change/Evidence of Coverage Assessment

The Centers for Medicare & Medicaid Services (CMS) conducts an annual analysis of the timeliness and accuracy of the Annual Notice of Change/Evidence of Coverage (ANOC/EOC) documents. In recent years, we have identified timeliness issues and inaccuracies in some of the ANOC/EOC mailings. Federal Regulations at 42 C.F.R. §422.111(a) and 42 C.F.R. §423.128(a) require Medicare Advantage Organizations and Prescription Drug Plan Sponsors (organizations) to disclose plan descriptions in a clear, accurate, and standardized form at the time of enrollment and at least annually thereafter, 15 days before the annual coordinated election period (see Section 60.7 of the Medicare Marketing Guidelines).

To account for timeliness of mailing, organizations must indicate the actual mail date in the Health Plan Management System (HPMS) within 15 days of mailing. For instructions on meeting this requirement, refer to the Update Material Link/Function section of the Marketing Review Users Guide in HPMS. To identify and notify beneficiaries of inaccuracies, organizations must use the standardized ANOC/EOC errata model and submit it for review via HPMS (under code 1125).

Please ensure you have entered mail dates into HPMS. In addition, please review your ANOC/EOC documents for accuracy and, as necessary, submit the errata by November 29, 2013.

CMS will be assessing timeliness of mailing and accuracy of documents, conducting a retrospective review of ANOC/EOCs, and issuing appropriate compliance actions based on our findings. An organization's failure to account for timeliness and/or identify inaccuracies may result in additional, separate compliance actions.

If you have any questions about the 2014 ANOC/EOC assessment, please contact Marie Gutierrez at marie.gutierrez1@cms.hhs.gov.