

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850



CENTER FOR MEDICARE

DATE: May 2, 2024

TO: All Part D Plan Sponsors, including PACE Organizations

FROM: Jennifer R. Shapiro, Director, Medicare Plan Payment Group

SUBJECT: Completion of the Reopening of the 2022 Final Part D Payment Reconciliation

CMS has completed calculations for the reopening of the 2022 Final Part D Payment Reconciliation,¹ and any payment adjustments stemming from the results of these calculations will be reflected in the June 2024 payment. The calculations were performed in accordance with § 1860D-14 and § 1860D-15 of the Social Security Act and associated regulations at 42 C.F.R. 423 subpart G and guidance. The reconciliation calculations utilize all accepted data as follows:

- Prescription Drug Event (PDE) data with a processed date, found on the Prescription Drug Front-end System (PDFS) response report, on or before June 30, 2023 (Cycle 3);
- All prospective payments made for Part D net of all adjustments processed through the April 2024 payment and corrected since the original 2022 reconciliation; and
- Direct and Indirect Remuneration (DIR) information received in the Health Plan Management System (HPMS) and accepted by CMS for the 2022 Part D payment reconciliation.

Sponsors will receive payment reconciliation reports, as well as Part D Exclusion from Reconciliation Reports (Please note there will be no changes in the Part D Exclusion report in the original CY22 reconciliation). The Part D Exclusion from Reconciliation Report was described in the following memoranda: “Reconciliation PDE Exclusion Process,” January 6, 2014, “Updates to the Reconciliation PDE Exclusion Process,” April 16, 2014, and “Updates to the Part D Potential Exclusion Warning Report and Exclusion Report,” December 20, 2019.² The report

¹ Note that guidance for this reopening was released in the January 19, 2024 HPMS memorandum, *Announcement of Global Reopening of the Part D Payment Reconciliation for Calendar Year 2022* (<https://www.cms.gov/about-cms/information-systems/hpms/hpms-memos-archive-weekly/hpms-memos-wk-3-january-15-19>).

² These memos are available at the following links:

January 6, 2014 and April 16, 2014 – <https://www.cms.gov/httpseditcmgovresearch-statistics-data-and-systemscomputer-data-and-systemshpms-hpms-memos-archive/hpms-memos-qtrs-1-4-1>

December 20, 2019 – <https://www.cms.gov/research-statistics-data-and-systemscomputer-data-and-systemshpms-hpms-memos-archive-weekly-items/hpms-memo-2>

identifies PDEs that were excluded from the reopening of the 2022 Part D payment reconciliation.

The payment reconciliation reports and the Part D Exclusion from Reconciliation Reports for reopening will be available in your reconciliation mailboxes at the Customer Service and Support Center (CSSC) on Thursday, May 9, 2024. If you cannot access these reports, please contact CSSC at 877-534-2772. Payment adjustments to remit and recover these calculated reconciliation amounts are planned for the June 2024 payment.

Reopening Process

Pursuant to 42 C.F.R. 423.346, CMS may reopen final payment determinations. Part D sponsors can submit requests for reopening, as instructed in the December 29, 2015 HPMS memorandum, “Revised Reopening Request Process and Notification of Overpayment Related to PDE and DIR Data.”³ Any questions regarding the reopening process can be sent to the Payment Process Contractor, Acumen, at PartDPaymentSupport@acumenllc.com.

Appeals Process

Pursuant to 42 C.F.R. 423.350, a Part D sponsor may appeal its reconciliation results. Appeals are filed when a plan sponsor does not believe that CMS applied its stated payment methodology correctly. Refer to the reopenings and appeals guidance, which was released through HPMS on May 8, 2008, for additional information on the process for filing an appeal.⁴ If you wish to appeal, your request must be filed and received by May 24, 2024. Requests for appeal should be addressed to Jennifer R. Shapiro and emailed to the Payment Process Contractor at PartDPaymentSupport@acumenllc.com.

³ Available at <https://www.cms.gov/Research-Statistics-Data-and-Systems/Computer-Data-and-Systems/HPMS/HPMS-Memos-Archive-Annual-Items/SysHPMS-Memo-Archive-%3F2015-Qtr4>

⁴ Note that the reopening process described in the May 8, 2008 HPMS memorandum, *The Part D Reopenings Process and the Part D Appeals Process* (available at <https://www.cms.gov/httpseditcmsgovresearch-statistics-data-and-systemscomputer-data-and-systemshpms-hpms-memos-archive/hpms-memos-qtrs-1-4-0>) has been updated by the April 6, 2018, June 1, 2017, and December 29, 2015 HPMS memoranda. However, the appeals process described in the May 8, 2008 memorandum is still current and should be followed to file an appeal (with the exception of the contact information, as indicated in this memorandum).