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TO: Part D Plan Sponsors

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

SUBJECT: 2011 Medicare Part D Patient Safety Reports and Website Enhancements

DATE: April 22, 2011

The Patient Safety Reports, which are currently available for Part D sponsors to access on the Patient Safety Analysis Website, will be updated with 2011 Prescription Drug Event (PDE) data. The reports will be available during the May report update. This memo describes the launch of the 2011 Patient Safety Reports as well as information on website enhancements and outlier reporting.

To access the Patient Safety Reports and outlier notifications, you must be an authorized user of the Patient Safety Analysis Website. Information on the access authorization process is provided below. The deadline for new user authorization is one week after the date of this memo.

Background

Performance and quality measures were developed by CMS so that Medicare beneficiaries have the information necessary to make informed enrollment decisions by comparing available health and prescription drug plans. As part of this effort, CMS currently calculates and publicizes five patient safety measures: High Risk Medication (HRM), Diabetes Treatment (DT), Drug-Drug Interaction (DDI), Diabetes Medication Dosage (DMD), and Adherence (ADH). The HRM and DT measures, which are adapted from the measures developed and endorsed by the Pharmacy Quality Alliance (PQA) and endorsed by the National Quality Forum (NQF), contribute to a plan's Part D Star Rating and are available on the Medicare Plan Finder at www.medicare.gov. The DDI, DMD, and ADH measures, which are measure concepts developed and endorsed by the PQA, are part of the Part D Display Measures available on the CMS website (http://www.cms.hhs.gov).

Part D sponsors currently have access to monthly Patient Safety Reports via the Patient Safety Analysis Website (https://PartD.ProgramInfo.US/PatientSafety) to compare their performance to overall averages and monitor their progress in improving the Part D patient safety measures over time. These actionable reports include contract-level patient safety reports for expanded analyses and information and detailed beneficiary-claim level and outlier reports. Sponsors can also view an 'at-a-glance' Rate Summary website feature and Performance Graphs. For additional information, User Guides and the NDC level medication lists used to calculate the measures are available on the Patient Safety Analysis Website under Help Documents.

Patient Safety Reports with 2011 Prescription Drug Event (PDE) Data

CMS will begin releasing monthly Patient Safety Reports with 2011 PDE data during the May 2011 report update. The measures in these reports are calculated using 2011 PDE data received up until one month before the release of the report. For example, the reports released on June 30, 2011 contain PDE data for 2011 dates of service received from January 2011 through May 2011. Each monthly report is updated as more complete 2011 PDE data are received from Part D sponsors. The final 2011 Patient Safety Reports will be released in July 2012, one month after the submission deadline for 2011 PDE records to CMS.

Overlap with 2010 Patient Safety Reports

The 2010 Patient Safety Reports will continue to be released on a monthly basis until July 2011 when the final 2010 rates will be calculated. Consequently, for the months of May, June, and July, many Part D sponsors will have both the 2010 and 2011 reports available for download each month. The naming conventions of the files and the workbooks within them will indicate the year of service of the PDE data in that report. Part D sponsors active only in the 2010 or 2011 benefit year will only see the report for that year.

Rate Summary and Performance Graph Features

Patient Safety website users can currently view an 'at a glance' summary of their performance in each of the patient safety measures across one or more Part D contracts based on each users' authorized access. The Rate Summary includes a summary of their current rate for the most recent monthly report and highlights if the rate is worse than the average, the percentage point difference from the previous month's rate, and the percentage point difference compared to the contract type average (such as standalone Prescription Drug Plan (PDP) or Medicare Advantage Prescription Drug Plan (MA-PD)).

Patient safety measure Performance Graphs are also available and allow sponsors to graphically trend their monthly rates over time and show how the rates compare to the contract type average over time. Upon the launch of 2011 Patient Safety Reports, users will be able to access the Rate Summary and Performance Graph features for both report years.

Outlier Reporting

Part D sponsors with outlier patient safety rates are notified each month. Outlier notifications for a given report month are issued one calendar week after the release of the Patient Safety Report, and sponsors are required to submit a response form for every identified outlier, describing a plan for improvement or reasons for the outlier rate, within two weeks of the outlier notification. All authorized users of the Patient Safety Analysis Website for a sponsor with outlier(s) will receive the email notifications. While these outlier notices do not constitute compliance actions, failure to respond or to provide sufficient responses may result in compliance actions.

The outlier reporting will continue to be conducted using 2010 PDE data until the final 2010 reports are released in July 2011. After that time, outlier reporting will be conducted using 2011 PDE data. For information on the methodology to define outlier threshold rates and to identify outlier contracts, refer to the 'Patient Safety Analysis: Methodology for Identifying Outliers' document located in the Help Documents section of the website. A Patient Safety Website User Guide is also posted on the website with information on how to view and respond to outlier issue notifications.

Access to the Patient Safety Analysis Website

To access the Patient Safety Reports, you must be an authorized user of the Patient Safety Analysis Website. CMS' contractor, Acumen, LLC, currently manages multiple websites for Medicare Part D contracts, including the Patient Safety Analysis Website. In accordance with Federal Information Security Management Act (FISMA) regulations, only the Medicare Compliance Officer is authorized to give access to these websites for each contract.

To streamline this process, Acumen has developed the User Security website – a web tool that allows Medicare Compliance Officers to manage their users on the Part D websites.

- **If your contract is continuing from CY2010**, you already have access to the User Security website.
- **If your contract is new in CY2011**, you will receive log-in credentials from Acumen shortly.

To add users and assign them permissions to the Patient Safety Analysis Website, you must log onto the User Security Website (https://partd.programinfo.us/User_Security). For security purposes, each contract is allowed up to five users.

- **If your contract is continuing from CY2010**, currently authorized users will maintain their access to the Patient Safety Analysis Website through the transition to CY2011. You may choose to keep the same users or you may modify users.
- **If your contract is new in CY2011**, you must authorize new users for the Patient Safety Analysis Website.

Once users have been added, Acumen will send these authorized Patient Safety Analysis Website users:
- An email with the website user guide
- A letter with login credentials via USPS

Any general questions related to this Patient Safety Analysis project should be sent via email to PartDMetrics@cms.hhs.gov. For technical questions related to website or report access, please contact Acumen at PatientSafety@AcumenLLC.com or by phone at (650) 558-8006.

Thank you for your continued dedication to helping our beneficiaries.