

Coordination and Collaboration between Part D Plans and State Pharmaceutical Assistance Programs

Goal: Identify a plan of action by Part D plans that demonstrates their commitment to working collaboratively with State Pharmaceutical Assistance Programs (SPAPs) to address the special issues and concerns of the SPAPs arising from implementation of the Medicare Part D prescription drug program and build upon successful partnerships currently in place between Medicare Advantage plans and SPAPs to coordinate benefits. The following proposals to assist in achieving this goal are recommended for consideration:

Beneficiary Information

- **Joint action to develop and disseminate targeted information about the Part D program to Medicare beneficiaries enrolled in SPAPs.** Part D plans will work with CMS and SPAPs during 2005 to assist in the development and dissemination of information to Medicare beneficiaries enrolled in SPAPs that is tailored to address Part D options, transition issues, and enrollment processes in coordination with SPAP enrollment.
- **Marketing and enrollment materials.** Beyond initial implementation, Part D plans will work with SPAPs in coordination with CMS' ongoing activities to develop marketing and enrollment materials targeted to beneficiaries in SPAPs that explain the Part D and SPAP benefits and how the benefits of each organization are coordinated.

Part D Plan/SPAP Communication and Coordination

- **Liaisons between Part D plans and SPAPs.** Each Part D plan and SPAP will identify an individual who would serve as the principal contact person for Part D implementation. These contacts will focus on identification and resolution of SPAP/Part D plan implementation issues on a Part D plan-specific basis.
- **State-level Part D coordinating committees.** CMS will facilitate establishment in each state that has an SPAP (unless the SPAP declines) of a coordinating committees comprised of representatives of the Part D plans and the SPAP. These committees will meet on a regular basis to supplement Part D plan-specific discussions by provide an ongoing forum for identifying and resolving SPAP and Part D plan operational issues that can best be addressed jointly. The coordinating committee will also have processes in place to assure that urgent issues that merit immediate action are addressed in a timely manner outside of the regular meeting cycle.
- **Establishment of a national forum for Part D/SPAP coordination.** CMS will facilitate establishment an ongoing national forum comprised of representatives of SPAPs

and Part D plans to identify operational issues that can best be addressed at the national level and develop recommendations to CMS for their resolution. It will also provide a forum for sharing best practices. This group will initially meet quarterly.

Operational Issues

- **Prescription drug transition plans for SPAP enrollees.** Part D plans are required to develop a transition plan for all new Part D plan enrollees who have been prescribed Part D covered drugs that are not on the Part D plan's formulary. In developing their transition policies, Part D plans will consult with SPAPs to ensure consideration of the special circumstances of SPAP enrollees and promote coordination with SPAPs.
- **Coordination of benefits.**
 - + *Electronic claims processing.* CMS is establishing a TrOOP facilitator that will play a critical role in the timely exchange of information between and SPAPs, as well as other payers, to ensure that beneficiaries receive the full benefit of all available coverage when out-of-costs are charged at the pharmacy and information essential for tracking TrOOP is available to Part D plans. As this system is designed and implemented CMS and Part D plans will work with SPAPs to incorporate features that will facilitate coordination of benefits between Part D plans and SPAPs. As initial implementation takes place, CMS and Part D plans will work with SPAPs on transition issues to minimize administrative burden and ensure that SPAP enrollees who are enrolled Part D do not experience disruptions.
 - + *Benefit coordination.* Facilitated by designated liaisons (see discussion above), Part D plans will work collaboratively with SPAPs to identify practical approaches to mitigate concerns and promote coordination in such areas as drug benefit design issues, such as formulary differences, preauthorizations, step therapy protocols and other pharmacy benefit management techniques. These activities can build on current best practices in the coordination of benefits between private plans and SPAPs. Future action, action may include training conducted by Part D plans for SPAP staff to ensure their familiarity with these Part D plan features.
- **Part D exceptions processes.** Part D plans are required to establish timely and readily accessible exceptions processes for coverage of non-formulary drugs and coverage of drugs at lower tier. In the development of these processes and the beneficiary materials that explain them, Part D plans will consult with SPAPs to ensure consideration of special issues of concern to SPAPs.
- **Reporting.** Based on data elements and formats used to satisfy CMS reporting requirements, Part D plans will on the processing of grievances, and appeals of filed by SPAP enrollees to provide information to facilitate SPAP evaluation of Part D plan performance.

- **Pharmacy Networks.** To the extent SPAPs have network retail pharmacies that are not part of a Part D sponsor's pharmacy, Part D plans will work with SPAPs to facilitate the contracting with such pharmacies under CMS' any willing pharmacy rules. Part D plans will work with SPAPs to develop protocols for prescription drugs dispensed by mail order pharmacies that may not be included in the SPAP's network.
- **Sharing of enrollment information.** As a foundation for promoting coordination of benefits and beneficiary information, Part D plans and SPAPs will establish mechanisms for the sharing of enrollment data. Discussions regarding establishing of these systems should include exploration of the potential for CMS to facilitate this exchange of information as well as already existing practices between Medicare Advantage plans and SPAPs