



CENTER FOR DRUG and HEALTH PLAN CHOICE

DATE: November 26, 2008
TO: All Prescription Drug Plan and Medicare Advantage-Prescription Drug Plan Sponsors
FROM: Cynthia Tudor, Ph.D., Director, Medicare Drug Benefit and C&D Data Group
RE: Continuation of the Low Income Subsidy Match Rate Project

The accuracy of Low Income Subsidy (LIS) information that Prescription Drug and Medicare Advantage-Prescription Drug Plans have for Medicare beneficiaries is extremely important to CMS. This information is vital to ensuring that all low-income beneficiaries, especially auto-enrollees, are charged the correct premiums and co-payments for their prescription drugs.

Since the 2007 benefit year, Acumen, LLC has been assisting CMS and Part D sponsors improve the accuracy of enrollment information for LIS beneficiaries by matching monthly enrollment information submitted by Part D sponsors to the corresponding enrollment data on file in CMS' records and providing detailed monthly exception reports to Part D sponsors to facilitate resolution of any discrepancies. CMS is very pleased with the results of this effort, which currently show that approximately 99% of LIS beneficiaries on CMS' records have matching or more favorable premium and co-payment information on Part D sponsors' records.

This memo is to inform Part D sponsors that CMS will continue the LIS match rate project for the 2009 benefit year and Acumen, LLC will continue to assist CMS and Part D sponsors in this process. All Part D sponsors will participate in this process, with the following exceptions: PACE contracts and any contracts that exclusively service U.S. territories will not be required to participate. For all other Part D sponsors, the basic process will continue as follows:

1. All Part D sponsors will upload enrollee data to the CMS contractor (Acumen) via a secure website on a monthly basis. Acumen will contact sponsors individually to specify each contract's monthly submission dates.
2. Acumen will access contract and CMS LIS data to analyze and compare the two data sets, calculate a match rate and identify exceptions. Monthly reports will be generated to track exceptions.
3. Acumen will release contract-level reports back to sponsors via a secure website.
4. CMS will monitor plan performance on on-time data submission and the accuracy of these data.
5. CMS will publish the LIS match rate for each sponsor on the Medicare Prescription Drug Plan Finder.

Attachments to this memo describe in detail what the next steps are for Part D sponsors. Attachment A explains how to get started with obtaining access for new users and getting started on this project. Attachment B provides a general overview of the activities to be performed by Part D sponsors and Acumen, LLC.

In summary, the schedule of events following this memo is described in the table below:

Action	Date
<p>New 2009 Contracts: Identify up to five authorized users for the Acumen LIS Match Rate Website and submit contact information through the Acumen User Security Website – instructions are included in Attachment A</p> <p>Contracts Continuing from 2008: A list of current users will be sent to each contract’s Medicare Compliance Officer. Validation of current users, removal of users, and submission of contact information for any new users must be conducted through the Acumen User Security Website</p>	<p>New user requests are due within 7 days of receipt of the welcome package from Acumen. Current user validations are due by 11/26/08.</p>
<p>New Contracts and Continuing Contracts that authorize new users: Be prepared to receive login credentials to access Acumen LIS Match Rate Website</p>	<p>Rolling-basis, following submission of contact information</p>
<p>All Contracts: Review the “Overview of the LIS Data Matching Process” in Attachment B and ensure authorized users are familiar with the process and data variables.</p>	<p>No later than 11/26/08</p>
<p>All Contracts: Opportunity for users to test LIS Match Rate Website and upload test data</p>	<p>12/22/08 to 1/2/09</p>
<p>All Contracts: Production data to be submitted by contracts for LIS matching</p>	<p>1/7/09 to 1/9/09 (each contract will be contacted by Acumen with details about their submission day) and reoccurring monthly thereafter</p>

CMS appreciates your cooperation with Acumen, LLC and all of your efforts in making the LIS matching project a success. If you have any questions about this project or process, please contact Acumen at LIS@acumenllc.com or (650) 558-8006.

ATTACHMENT A: General Instructions

Acumen has created a website to facilitate the LIS Match Rate process. Part D sponsors will use this site, <https://PartD.ProgramInfo.US/LIS>, to upload, download, and communicate with Acumen. This secure website will be accessible only to authorized participants, with each sponsor utilizing a space on this site that is separately secured from all other participants. The website will facilitate the communication, tracking, and resolution of contract-specific issues through use of discussion boards and reports exclusive to the Part D sponsor's designated representatives.

For Acumen to grant access to the LIS Match Rate Website, **the Medicare Compliance Officer of participating Part D sponsors must authorize users through the User Security Website at https://PartD.ProgramInfo.US/User_Security.**

- For security purposes, contracts are limited to **five** authorized users.
 - All users will have access to all features of the LIS Match Rate Website, including uploading data, downloading match rate reports, and viewing and replying to discussion boards. In addition, all users will receive email notifications regarding data submissions and report availability.
 - As troubleshooting may require reviewing information for specific beneficiaries, users are expected to be authorized to access identifiable beneficiary data.
 - To help you plan for this effort and to identify the appropriate users, the information on the next page provides an overview of the process you should expect.
- In order for new users to gain access to the LIS Match Rate Website, **your contract's Medicare Compliance Officer must complete the following steps:**
 1. Acumen, LLC currently manages multiple websites for Medicare Part D contracts, including the LIS Match Rate 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 you are a Part D sponsor that was active in 2008**, your current Medicare Compliance Officer should already have access to the User Security Website through existing work with Acumen.
 - **If you are a new Part D sponsor for 2009**, you should have recently received or will soon be receiving a welcome email and a letter with login credentials via USPS.
 2. To authorize users for the LIS Match Rate Website, the Medicare Compliance Officer, must log onto the User Security Website to:
 - Submit an Available User Request Form for each proposed user.
 - Authorize access permissions for each user.
 - To ensure timely access to the LIS Match Rate Website, Medicare Compliance Officers must complete the user authorization process as soon as possible but no later than **November 26, 2008** for current users and within seven days of receipt of the welcome package from Acumen for new users.

3. Acumen will send authorized LIS Match Rate Website users:
 - An email with the website user guide and details on file creation and variables
 - A letter with login credentials via USPS
- If you are an existing Part D sponsor that participated in the LIS Match Rate process in 2008, you will be receiving an email listing the current authorized users for your contract. If you would like to make any changes, please log on to the User Security Website to add or remove users by **November 26, 2008**.

If you have any questions, please contact Acumen at LIS@acumenllc.com or (650) 558-8006.

ATTACHMENT B: Overview of the LIS Data Matching Process

Initial Setup Steps

Acumen will begin sending welcome emails to authorized users as soon as they receive contact information. These emails will include detailed instructions for initial upload tests and ongoing website usage. Login letters containing login credentials will arrive separately via USPS.

Step 1: Upload Data

Contracts must upload data on a monthly schedule. This upload should be done by authorized LIS Match Rate Website users identified through the User Security Website. The format of submitted data sets will be comma delimited text files, zipped using standard archiving software. Detailed information about file structures is available on the website. Acumen will validate data submissions to check formats and structure, and authorized LIS Match Rate Website users will be expected to resolve any data upload issues by correcting data structures and resubmitting files.

The following list shows the specific variables that will be requested (much more detailed information on variables and file creation will be provided in a User Guide once authorized users have been identified).

Variables for All Part D Beneficiaries

Beneficiary's Claim Account Number
Contract Number (Contract Identification Number)
Plan Benefit Package (PBP) Number
Beneficiary's Segment Identification Number
Beneficiary Enrollment Effective Date
Beneficiary Enrollment End Date
Part D Premium Amount
Part D Late Enrollment Penalty Amount
Part D Penalty Waived Amount
Total Premium Amount
Beneficiary Date of Birth
Beneficiary Gender
Beneficiary Zip Code
Part C Premium Amount
Date of File Creation

Additional Variables for LIS Eligible Beneficiaries

Subsidy Start Date
Subsidy End Date
Part D Premium Subsidy Percentage
Low Income Co-payment Level ID
LIS Subsidy Amount
LIS Penalty Subsidy Amount

Step 2: Reporting

Acumen will process submitted contract data and link beneficiary records with those contained in CMS files to calculate LIS match rates. Reports will be made available to contracts presenting match rates and identifying those specific cases not matching in CMS and contract files. For this reason, LIS Match Rate Website users must be limited to people with authorization to access the beneficiary level identifiable information contained in these reports.