

## HPMS E-Mail

**Date:** March 1, 2018

**Subject:** Retail Pharmacy Network Access and Preferred Cost-Sharing Pharmacy Access Analysis Results for AEP CY 2018

The data from CMS's retail pharmacy access analysis for AEP CY 2018 is now available in HPMS for review. Part D sponsors are afforded the opportunity to review the data and submit questions and/or concerns prior to publishing the data to the CMS Webpage. To access the Part D retail access data in HPMS, select: "Quality and Performance," -> "Performance Metrics," -> "Retail Pharmacy Access Data," -> "Pharmacy Network Access Data," and finally, select the performance period.

CMS will use the analysis to identify sponsors' plans that are not meeting the retail pharmacy access standard (look at data marked as "entire network" only), as well as plans that are 2018 preferred cost sharing pharmacy (PCSP) access outliers (look at the data marked as "PCSP network" only). As indicated in the 2018 Call Letter, a plan is an outlier if it offers access to a PCSP: within 2 miles of fewer than 40% of beneficiaries' residences in urban areas; within 5 miles of fewer than 87% of beneficiaries' residences in suburban areas; or at a rate lower than the current retail pharmacy convenient access standard of access within 15 miles of fewer than 70% of beneficiaries' residences in rural areas. Please note that the PCSP analysis is not applicable to Medicare-Medicaid Plans, or plans that do not offer a preferred cost sharing benefit.

CMS will review the marketing materials for the PCSP outliers to determine if the PCSP outlier marketing disclaimer that is required in Section 50 and Appendix 5 of the 2018 Medicare Marketing Guidelines was used appropriately. Sponsors identified as PCSP access outliers that did not use the PCSP outlier disclaimer may receive compliance or enforcement actions. Information on PCSP access levels for each plan offering a preferred cost sharing benefit structure is posted to <https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovContra/index.html>.

Questions or concerns about the data for your plan(s) should be sent to [PartD\\_Monitoring@cms.hhs.gov](mailto:PartD_Monitoring@cms.hhs.gov) by March 17, 2018.