








M3P Checklist

Track the operational areas Part D plans need to update under the M3P program.







TABLE OF CONTENTS

- 02 Program Outreach
- 03 Program Enroll and Disenroll Process
- 08 Billing and Invoicing
- 10 PBM and Pharmacy Coordination
- 10 CMS Reporting
- 11 Monitoring and Evaluation








PROGRAM OUTREACH

Project Type	Project Item	CMS Guidance	Description
Customer Support and Call Center	General member inquiry support		Develop a calculator to determine if a member is eligible.
Member Communications	Mail notices to members who benefit from program		
Member Communications	General education on the program and how to enroll		
Member Communications	Outreach to members when low-income subsidy (LIS) status changes		Target members who may likely benefit or be less likely to benefit when they experience a change in LIS status.
Training and Education	Educate customer-facing teams on the overall program		
Training and Education	Train marketing teams		
Provider Communication	Share general education and program information to contracted providers		Targeted communication to providers based on specialty and likelihood of prescribing high-cost Part D drugs.








PROGRAM ENROLL AND DISENROLL PROCESS

Project Type	Project Item	CMS Guidance	Description
Customer Support and Call Center	Process enrollment inquiries		
Customer Support and Call Center	Enroll members over the phone		Phone call must be recorded and reproducible for audit purposes.
Member Communications	Member is sent notice of inclusion in program or a request for more information digitally or non-digitally		
Member Communications	Notify members of enrollment and distribute M3P card via mail and digital outreach		Develop a process for providing M3P card information over the phone for urgent circumstances, such as when a member quickly needs a prescription filled, rather than wait for a card distributed via mail.
Member Communications	Mail involuntary terminations and relevant notices		Mail initial notice of failure to pay. Provide a 60-day grace period and then mail a removal for failure to pay notice.
Member Communications	Targeted calls to members at risk of disenrolling		Address member satisfaction and CAHPS by trying to help members avoid termination for failure to pay.








PROGRAM ENROLL AND DISENROLL PROCESS continued

Project Type	Project Item	CMS Guidance	Description
Member Communications	Plans encouraged to inform members of M3P when they are likely to benefit and being contacted for other reasons		Educate members about M3P when performing HRA, medication therapy management and medication adherence outreach.
Process	Forms to complete and mail to plan for enrollment into program		
Process	Year-round process requires a 24-hour turn around		This requires integration with the PBM's system to ensure claims adjudicate correctly at the point-of-sale.
Process	Review member information to determine eligibility or if more information is necessary		
Process	Develop member tools to support enrollment over the phone, through the mail and online		Members must receive a confirmation number for tracking if enrollment is submitted by phone or online.
Process	Termination process management with timeframes and communications		
Process	Appeals process for program enrollment and terminations		








PROGRAM ENROLL AND DISENROLL PROCESS continued

Project Type	Project Item	CMS Guidance	Description
Process	Develop member opt-out process		
Process	Coordinate payments that might apply to premiums over M3P invoices		Develop a mechanism to apply payments to unpaid premiums amounts over M3P invoices, when applicable.
Process	Collection and coordination with plan related to agent of record (AOR) information		Develop a mechanism to ensure the AOR is on file when a member opts into the program by an authorized representative.
Process	Specific requirements for D-SNP enrollment		Medicaid eligibility must be confirmed before opting a member into M3P for D-SNP.
Process	Process for "good cause" reinstatement into program		
Process	Process for preclusion from opting in for subsequent years		
Process	Coordination with membership ID card fulfillment for those members that opt in to the program		Membership ID card must include information about M3P and an election form.








PROGRAM ENROLL AND DISENROLL PROCESS continued

Project Type	Project Item	CMS Guidance	Description
Process	Coverage determination and redetermination requests		Determine how to support coverage determination and redetermination requests that would be related to the amount of cost-sharing owed for a Part D drug.
Process	Provide multiple means of payment acceptance		Coordinate with bank withdrawals, credit and debit payment, and check collection.
Process	Process to document date and time requests are received		
Reports and Analytics	Identify members who would benefit from the program		
Systems and Databases	Web tool to request enrollment and receive notifications		
Systems and Databases	Manage opt-in, opt-out and terminations with a 24-hour turnaround process		
Systems and Databases	Maintain member information		Link information to overall plan enrollment status.








PROGRAM ENROLL AND DISENROLL PROCESS continued

Project Type	Project Item	CMS Guidance	Description
Systems and Databases	Provide customer service access to member status and enrollment/disenrollment process		
Systems and Databases	Provide member tools to enroll and disenroll over the phone, through the mail and online		
Systems and Databases	Automatically determine eligibility		
Systems and Databases	Link Medicare Advantage and M3P enrollment status		
Systems and Databases	Member tools to request opt-out of program, including notifications		
Systems and Databases	Tool for customer service to access and track member status		
Training & Education	Training for program enrollment process		



BILLING AND INVOICING

Project Type	Project Item	CMS Guidance	Description
Customer Support and Call Center	Member appeals process and invoice amounts		
Customer Support and Call Center	Explanation of amount due		
Customer Support and Call Center	Support billing inquiries and grievances		Will need to determine level of support and reporting as Part D grievances would be items for annual reporting and participating in CMS program audits.
Member Communications	Additional member communications and follow-up collections		
Member Communications	Mail monthly invoices and EOBs with an online option		Having access to invoices and EOBs would be important for customer service to answer questions from members about differences seen on an invoice compared to monthly EOB.
Member Communications	Notice of failure to pay		
Reports and Analytics	Payment calculator		



BILLING AND INVOICING continued

Project Type	Project Item	CMS Guidance	Description
Reports and Analytics	Layperson explanation of amount due		For use with Customer Support.
Systems and Databases	Invoice management and billing system		Processing of monthly invoicing, including mailings.
Systems and Databases	Retro LIS adjustments		Retroactive adjustments and reimbursements to members when LIS changes have retroactive effective dates that caused over or under payment.
Systems and Databases	Invoice management and billing system for pharmacy reversals		Mechanism to account for pharmacy reversals that impact what a member filled during a month and the amount they should be invoiced for a given month.
Systems and Databases	Work with long-term care facilities to understand best billing approach		Some facilities do not bill directly under the member's Part D plan and would not necessarily be submitting to the PBM for the M3P.
Systems and Databases	Tool to track resolutions for inquiries, grievances and appeals		
Training and Education	Training on billing inquiry process		

PBM AND PHARMACY COORDINATION

Project Type	Project Item	CMS Guidance	Description
Customer Support and Call Center	Tier one call support		
Systems and Databases	Ongoing Program Enrollment Status reporting to PBM for processing of RX claims		

CMS REPORTING

Project Type	Project Item	CMS Guidance	Description
Reports and Analytics	CMS reporting		Reports to be determined.
Audit Support	Support for audit-related requests tied to M3P		Opt-in documentation, grievance documentation, coverage determination and redetermination documentation.

MONITORING AND EVALUATION

Project Type	Project Item	CMS Guidance	Description
Program Monitoring	Track program offer requirements		
Program Monitoring	Member experience and satisfaction surveys		
Program Monitoring	PBM program audits		

Partner with Healthmine to adapt to the regulatory challenges of the M3P program

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This document is not a complete list of requirements from Centers for Medicare & Medicaid Services. Please review the complete official guidance.