



MEDICARE-MEDICAID COORDINATION OFFICE

DATE: April 29, 2015

TO: Medicare-Medicaid Plans

FROM: Sharon Donovan
Director, Program Alignment Group

SUBJECT: Final CY 2016 Medicare-Medicaid Plan Provider and Pharmacy Directory
National Model Template

Attached to this memorandum is the CY 2016 Medicare-Medicaid Plan Provider and Pharmacy Directory national model template. This template will serve as the basis for state-specific models that Medicare-Medicaid Plans (MMPs) will use in CY 2016.

On February 19, 2015, CMS issued a survey and request for comments on requirements in the CY 2015 Provider and Pharmacy Directory. The impetus for the survey was feedback from beneficiaries, advocates, and MMPs indicating that vague or imprecise language in some directory requirements made them difficult to understand and fulfill. We received 64 thoughtful responses in support of increasing the directory's usefulness and clarifying information MMPs are required to provide.

While we acknowledge that some suggestions exceed the scope of feasible changes for the upcoming year, we appreciate all input received and consider it in the context of both short- and long-term improvements. We have clarified language in directory requirements found in existing three-way contract provisions and have updated the CY 2016 national model template in four ways. Examples include:

1. Adding and expanding instructions for MMPs.

- Use of subdirectories (page 1)
- Totals by provider type (page 9)
- Location-specific requirements for providers listed with more than one address (page 8)
- Information current as of the date of publication (pages 2 and 9)

2. Distinguishing between provider and facility requirements.

- Determination of provider type (page 8)
- Health care professionals and non-facility based support providers (page 9)
- Facilities and facility-based support providers (page 11)

3. Offering flexibility when requirements can be reasonably interpreted as “optional” or “as applicable.”

- Other credentials and/or certifications (pages 9 and 11)
- Public transportation types (pages 9 and 11)
- Specific cultural competencies (pages 9 and 11)

4. Simplifying language and including examples where possible.

- Health care professionals, facilities, and support providers (page 7)
- Opportunity to combine nursing facilities in one type and distinguish the kind of facility (page 11)
- Use of abbreviations or symbols (pages 9 and 11)
- Accommodations for individuals with physical disabilities (pages 9 and 11)

We are working with individual states now to customize state-specific language. We will release state-specific models to MMPs as soon as possible to facilitate full and timely compliance with directory requirements well before CY 2016 marketing begins. In the meantime, we urge MMPs to view the national model template as a high-level overview of general changes rather than the forthcoming guide for any particular state.

Recognizing challenges presented by the abbreviated lead-up to implementation in some demonstration states and the vague or imprecise language in directory requirements in the three-way contracts, we extended flexibility to MMPs with a path to compliance over time. Moving forward, we will leverage existing oversight and monitoring resources and more systematically address compliance with contractual requirements related to the Provider and Pharmacy Directory in CY 2016.

CMS and states support provider information that is helpful to enrollees in making educated decisions about their choices. Changes to the Provider and Pharmacy Directory align with messaging in the CY 2016 Final Call Letter, Guidance to Verify that Networks are Adequate and Provider Directories are Current, pages 138-140, issued April 6, 2015 as well as additional guidance in the Applicability of Final Call Letter Provisions to Medicare-Medicaid Plans memo issued April 7, 2015. Incremental changes to the directory for the upcoming year are part of our ongoing commitment to improve materials for Medicare-Medicaid enrollees.

Please contact the Medicare-Medicaid Coordination Office at MMCOCapsModel@cms.hhs.gov if you have any questions about the contents of this memorandum.