



Policy: PA.9001
Title: **Medicare Part D Benefit Information Tracking and Reporting**
Department: CalOptima Health PACE
Section: Not Applicable

CEO Approval: /s/ Michael Hunn 06/20/2024

Effective Date: 12/01/2014

Revised Date: 06/01/2024

Applicable to: ☐ Medi-Cal
☐ OneCare
☒ PACE
☐ Administrative

I. PURPOSE

This policy describes the tracking process by which CalOptima Health Program of All-Inclusive Care for the Elderly (PACE) documents Participants' True Out-Of-Pocket (TrOOP) Cost and Part D gross covered drug costs (GCDC) during enrollment and disenrollment.

II. POLICY

- A. Centers for Medicare & Medicaid Services (CMS) Part D regulations require CalOptima Health PACE organizations to track a Participant's TrOOP and GCDC and apply these costs to the TrOOP and benefit limits in order to place the Participant in the correct phases and provide the catastrophic level of coverage at the appropriate time after disenrollment.
- B. TrOOP threshold and GCDC are calculated on an annual basis and must be transferred between Part D plans if a Participant disenrolls and re-enrolls at any time before the end of the coverage year.
- C. For Participants disenrolling from CalOptima Health PACE and enrolling in another Part D plan, CalOptima Health PACE will report the TrOOP-related data to the Participant in a Transfer EOB document to convey to their subsequent plan sponsor.
- D. The Transfer EOB must be created even if the Participant did not have any CalOptima Health PACE plan Part D claims activity during the coverage year.

III. PROCEDURE

A. Disenrollment Procedure

- 1. CalOptima Health PACE Social Work Department shall review the weekly transaction reply reports to identify receipt of any disenrollment transactions with a transaction reply code of [014] or [015] indicating that a Participant has disenrolled, the disenrollment information will then be provided to CalOptima Health PACE Pharmacy Management.
- 2. Upon receipt of the transaction reply report, CalOptima Health PACE Pharmacy Management shall initiate the process to create a Transfer EOB in order to transfer the TrOOP balance and the gross

GCDC, if any, to the Participant's new plan of record. CalOptima Health PACE Pharmacy Management shall:

- a. Compute the Participant's CalOptima Health PACE-only GCDC; and
 - b. Enter the CalOptima Health PACE-only GCDC into the Dual Eligible CalOptima Health PACE TrOOP Calculator to determine the CalOptima Health PACE TrOOP amount.
3. CalOptima Health PACE Pharmacy Management shall mail a Transfer EOB document to the Participant, indicating the TrOOP balance and GCDC within seven (7) calendar days of receipt of the disenrollment transaction reply report.
 4. CalOptima Health PACE Pharmacy Management shall retain copies of Transfer EOB notices sent to Participants.

IV. ATTACHMENT(S)

Not Applicable

V. REFERENCE(S)

- A. "Dual-eligible CalOptima Health PACE Plan Member Accumulated True Out-Of-Pocket Cost Calculator," available at https://www.cms.gov/apps/troopcalculator/PACE_Calculator.xls
- B. Medicare Prescription Drug Manual- Chapter 14 Coordination of Benefits
- C. CalOptima Health PACE Program Agreement
- D. Title 42, Code of Federal Regulations (CFR), §§ 423.104 and 423.464

VI. REGULATORY AGENCY APPROVAL(S)

None to Date

VII. BOARD ACTION(S)

None to Date

VIII. REVISION HISTORY

Action	Date	Policy	Policy Title	Program(s)
Effective	12/01/2014	PA.9001	Medicare Part D Benefit Information Tracking and Reporting	PACE
Reviewed	01/01/2015	PA.9001	Medicare Part D Benefit Information Tracking and Reporting	PACE
Revised	05/01/2016	PA.9001	Medicare Part D Benefit Information Tracking and Reporting	PACE
Revised	07/01/2016	PA.9001	Medicare Part D Benefit Information Tracking and Reporting	PACE
Revised	11/01/2017	PA.9001	Medicare Part D Benefit Information Tracking and Reporting	PACE
Revised	12/01/2018	PA.9001	Medicare Part D Benefit Information Tracking and Reporting	PACE

Action	Date	Policy	Policy Title	Program(s)
Revised	10/01/2019	PA.9001	Medicare Part D Benefit Information Tracking and Reporting	PACE
Revised	02/01/2022	PA.9001	Medicare Part D Benefit Information Tracking and Reporting	PACE
Revised	05/01/2023	PA.9001	Medicare Part D Benefit Information Tracking and Reporting	PACE
Revised	06/01/2024	PA.9001	Medicare Part D Benefit Information Tracking and Reporting	PACE

IX. GLOSSARY

Term	Definition
Participant	An individual enrolled in the CalOptima Health PACE program.
Program of All-Inclusive Care for the Elderly (PACE)	PACE is a long-term comprehensive health care program that helps older adults to remain as independent as possible. PACE coordinates and provides all needed preventive, primary, acute and long-term care services so seniors can continue living in their community.
True Out-Of-Pocket (TrOOP) Cost	True out-of-pocket (TrOOP) costs are the payments that count toward a Part D beneficiaries' Medicare drug plan out-of-pocket threshold. TrOOP costs determine when a beneficiaries' catastrophic coverage will begin.