Attachment 3 September 22, 2011

Summary of Technical Changes from the 60-Day PRA Package for 2013 Draft Applications

TECHNICAL CHANGES						
Clarification		Purpose of the Clarification	Application			
			PDP	MA-PD	Cost	PACE
		GENERAL INFORMATION and INSTRUCT	IONS			
1.	Updated background information.	Pursuant to internal discussion, abbreviated background information to eliminate description of statutory amendments to legislation creating the Part D program.	1.2	1.2	1.2	1.1
2.	Updated schedule.	Pursuant to internal discussion, updated language in schedule to indicate that November 11 is the recommended date by which applicants should submit their notices of intent to apply in order to ensure that they have access to HPMS when the application is released.	1.4	1.4	1.4	NA
3.	Updated discussion of performance monitoring	Pursuant to internal discussion, added a reference to the regulation that clarifies the scope and authority for performance monitoring.	1.6.2	1.6.2	1.6.2	NA
4.	Reduce the number of copies of the PACE Application to be mailed from 5 to 3.	Pursuant to internal discussion, reduced the number of copies of the PACE application that applicants must provide.	NA	NA	NA	2.3
		PROGRAM INTEGRITY AND COMPLIANCE P	ROGRAM		•	•
5.	Added language to discussion of compliance program requirements	Pursuant to internal discussion, clarified that the Medicare Compliance Officer could be an employee of the Applicant, its parent company, or an affiliate/subsidiary of the Applicant.	3.1.3	3.1.2	3.1.2	NA
		COVERAGE DETERMINATIONS				
6.	Added language to attestation to indicate that the medical director must be licensed.	Added clarifying language pursuant to internal discussion	3.9.A	3.10.A	3.8.A	NA
		MARKETING AND BENEFICIARY COMMUNIC	CATIONS			
7.	Deleted language in several attestations indicating that notification of certain decisions/rights must be in writing.	Deleted language pursuant to internal discussion because regulations permit oral notification with written follow up within certain time frames.	3.13A	3.14A	3.12A	NA

NOTE 1: Nothing in the technical changes table increases burden on the applicant.

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NOTE 2: The Service Area Expansion Application is a condensed version of the initial application.