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August 17, 2007

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CMS, Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development—C
Attention: Bonnie L. Harkless
Room C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

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Dear Ms. Harkless;

The following letter serves as formal comment on:

CMS Form: 10137
Date: July 13, 2007 Version
Name: Application for Prescription Drug Plans (PDP); Application for Medicare Advantage Prescription Drug (MA-PD); Application for Cost Plans to Offer Qualified Prescription Drug Coverage; Application for Employer Group Waiver Plans to Offer Prescription Drug Coverage; Service Area Expansion Application for Prescription Drug Coverage

Quest Analytics L.L.C., a software and technology company is formally requesting a change to the acceptable methods for completing Network Access Reporting as described in the requested applications. This change would allow The Quest Analytics Suite™ to be utilized as an acceptable tool along with GeoNetworks® to complete the various network accessibility reports as illustrated within the application forms.

Quest Analytics has demonstrated, through a proof of concept analysis, that the Quest Analytics Suite meets the needs for this reporting. In addition, it provides the opportunity to streamline your future approach by adding a new option of producing the reports as either printed output or in electronic (Excel, text, etc.) format for submission to CMS. With the electronic submission, the results could be imported into your systems and eliminate the manual process of transposing this data from paper copy. A copy of the results of our proof of concept for Region 05 is included as supporting documentation. Additionally, we have included the language to simplify the instructions on using The Quest Analytics Suite in the attachments. Under the Quest Analytics Suite model you simply provide a template for participants to leverage within their copy of the application, insuring consistent results.

The Quest Analytics Suite continues to be adopted by market leaders as the next generation of network analysis tools. This in part is due to the capabilities our tools provide for meeting all of the existing reporting needs as well as the added functionality that we provide for our clients - such as



measuring access to high quality facilities (qualitative access) or electronic output and improved accuracy.

We appreciate your consideration in providing the market a choice in completing their network access reporting needs. Please contact me if you have any questions or need additional information.

Sincerely,

A handwritten signature in cursive script, appearing to read "John P. Weis".

John P. Weis
Co-founder
Quest Analytics, L.L.C.

Attachments:



Network Access Analysis - Region 05

All Region 5 Beneficiaries

PDP Region 5 (DE, DC, MD)

Created for...

Centers for Medicare and Medicaid Services

Created by...

S0000: Mid Atlantic Pharmacy Providers

July 26, 2007

Contents

All Region 5 Beneficiaries

PDP Region 5 (DE, DC, MD)

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Created for...
Centers for Medicare and Medicaid
Services
Created by...
S0000: Mid Atlantic Pharmacy
Providers

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Access Detail by County - All Employees 2

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Rural Beneficiaries
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Service Area
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Urban Beneficiaries

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Suburban Beneficiaries



July 26, 2007

Created by...
S0000: Mid Atlantic Pharmacy
Providers

Access Standard
1 Pharmacy within 5 Miles

Provider Group
Part D Retail Pharmacy Network

¹ The Access Standard is defined as having: 1 (Part D Retail Pharmacy Network) Provider within 5 miles

All Employees									
State	County	Total	Total	With Access		Without Access		Average Distance to Providers	
		Providers	Employees	#	%	#	%	1	
Delaware	New Castle County	99	38,766	38,749	99.9	17	0.1	1.1	
Maryland	Anne Arundel County	109	40,680	40,470	99.5	210	0.5	1.3	
	Baltimore County	175	38,848	38,806	99.9	42	0.1	1.3	
	Cecil County	14	160	77	48.1	83	51.9	5.1	
	Charles County	30	3,234	3,077	95.1	157	4.9	1.8	
	Frederick County	53	725	636	87.7	89	12.3	1.3	
	Harford County	53	9,811	9,811	100.0	0	0.0	0.9	
	Howard County	43	12,756	12,756	100.0	0	0.0	1.4	
	Montgomery County	143	33,206	33,202	99.9	4	0.1	1.4	
	Prince George's County	131	29,715	29,715	100.0	0	0.0	1.5	
	Wicomico County	22	671	671	100.0	0	0.0	1.0	
	Worcester County	16	2,682	2,682	100.0	0	0.0	1.2	
	Totals	789	172,487	171,902	99.7	585	0.3	1.3	
	Grand Totals	888	211,253	210,651	99.7	602	0.3	1.3	

Rural Beneficiaries

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Access Detail by County

Rural Region 5 Beneficiaries

Region 5 (DE, DC, MD)

July 26, 2007

Created for...

Centers for Medicare and Medicaid
Services

Created by...

S0000: Mid Atlantic Pharmacy
Providers

Access Standard

1 Pharmacy within 15 Miles

Provider Group

Part D Retail Pharmacy Network

1 The Access Standard is defined as
having: 1 (Part D Retail Pharmacy
Network) Provider within 15 miles

All Employees						
State	County	Total Providers	Total Employees	With Access #	Without Access #	Average Distance to Providers 1
Delaware	Kent County	22	21,469	21,469	0	0.0
	New Castle County	99	5,952	5,952	0	0.0
	Sussex County	41	39,492	39,492	0	0.0
	Totals	163	66,943	66,943	0	0.0
Maryland	Alegany County	21	14,554	14,452	102	0.7
	Anne Arundel County	109	4,930	4,930	0	0.0
	Baltimore City County	152	757	757	0	0.0
	Baltimore County	175	12,461	12,461	0	0.0
	Calvert County	12	9,050	9,050	0	0.0
	Caroline County	7	5,068	5,068	0	0.0
	Carroll County	33	19,777	19,777	0	0.0
	Cecil County	14	12,187	12,187	0	0.0
	Charles County	30	9,978	9,925	53	0.5
	Dorchester County	9	5,880	5,577	303	5.2
	Frederick County	53	26,128	26,128	0	0.0
	Garrett County	10	6,032	6,018	14	0.2
	Harford County	53	20,252	20,252	0	0.0
	Howard County	43	3,905	3,905	0	0.0
	Kent County	8	5,003	5,003	0	0.0
	Montgomery County	143	4,965	4,965	0	0.0
Virginia	Prince George's County	131	5,945	5,945	0	0.0
	Queen Anne's County	7	5,815	5,815	0	0.0
	Somerset County	3	3,740	3,687	53	1.4
	St. Mary's County	13	9,588	9,484	104	1.1
	Talbot County	9	8,229	8,229	0	0.0
	Washington County	31	22,027	22,027	0	0.0
	Wicomico County	22	13,267	13,267	0	0.0
	Worcester County	16	8,808	8,808	0	0.0
	Totals	1,104	238,376	237,747	629	0.3
	Grand Totals	1,267	305,319	304,690	629	0.2

Service Area

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Service Area Detail by State

All Region 05 Beneficiaries
PDP Region 5 (DE, DC, MD)
July 26, 2007

Created for...
Centers for Medicare and Medicaid
Services for...
Created by...
S0000: Mid Atlantic Pharmacy
Providers

Provider Group
Part D Retail Pharmacy Network

Service Area Summary			
Total	Providers	Employees	State
131,578	163	131,578	Delaware
73,594	103	73,594	District of Columbia
707,733	1,104	707,733	Maryland
912,905	1,370	912,905	Grand Total

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Appendix X Retail Pharmacy Network Access Instructions

Accessibility Analysis Instructions

All Applicants are strongly encouraged to use GeoNetworks® or The Quest Analytics Suite™ to compile the reports as outlined in this appendix. If this is not possible, the Applicant must contact Dennis Hodges at dennis.hodges@cms.hhs.gov (410.786.3048) no later than February 1, 2008 to determine if analyses provided by an alternative method are acceptable. Alternative methods must produce analyses that will result in data directly comparable to the results produced by GeoNetworks® or The Quest Analytics Suite™. Applicants that wish to use alternative methods will be required to demonstrate how their analysis is comparable to results produced by GeoNetworks® or The Quest Analytics Suite™.

Though in many instances CMS provides specific instructions for formatting and compiling plan accessibility reports, this appendix is not intended to provide step-by-step instructions for the use of GeoNetworks® or The Quest Analytics Suite™. The instructions and examples provided here were developed using GeoNetworks version 7.5.2.¹ and The Quest Analytics Suite version 2007.3. It is the responsibility of Applicant to ensure that their submission provides adequate information for CMS to determine if each of their offerings meets the retail pharmacy access submission requirements. Please note that these retail pharmacy access reports will be uploaded into HPMS on the appropriate Pharmacy Access Upload page.

If you are using the The Quest Analytics Suite, a project file is available for you to download and utilize for the completion of your reports and includes the applicable access standards, report pages and preferences. This file can be accessed at the following URL: _____

Step	Quest Analytics Suite	GeoNetworks
Defining The Medicare Beneficiary File		
	<p>The Medicare Beneficiary File "Medicare Beneficiaries by State, Region, ZIP MMDD2007.xls" is provided by CMS and can be accessed at the following URL: _____ . The Medicare Beneficiary File referenced above contains ZIP Codes and beneficiary counts for Applicants as of _____, 2007. <i>Use of this file is required for the accessibility analysis submission.</i></p>	
1	<p>Download this file and create a sub-file(s) specific to their service area and/or region(s) and/or state as needed to support the level of analyses required (specified below). Applicants may not use beneficiary counts from other sources in their accessibility analyses.</p>	

¹ Systems files for CDF, DPF, PPF, RPF, ZDF are version 6.20. System file for Qms is version 17.00.

2	<p>Open the Quest Analytics Project file you downloaded and link to the data sub-file in The Quest Analytics Suite by adding an Employee Group and name it "All Beneficiaries". Applicants may geocode by selecting the "Geocoding Tab" and select "Geocode Now" during this step, or they may defer geocoding the population file until run time.</p>	<p>Import the data sub-file into GeoNetworks® to create a geo-coded population file based on the Census data sub-file. A population file is created by navigating to Data > Populate > From File> "select and open the file". Applicants may geocode by selecting the "geocode after populate" check box during this step, or they may geocode the population file in a later step outlined below.</p>
3	<p>Verify that the beneficiary (employee) count in the population file is consistent with the total beneficiary census for the sub-file used as the basis for the analyses. CMS will check the count of beneficiaries provided in the reports against the count of beneficiaries residing in the plan's service area.</p>	
4	<p>The Quest Analytics Suite automatically assigns an Urban, Suburban, or Rural classification for each Medicare beneficiary record consistent with the definitions specified in 42 CFR § 423.100.</p>	<p>Assign an Urban, Suburban, or Rural indicator to each Medicare beneficiary record in the Population file using the GeoNetworks® function, "Assign Place Names." Place names may be assigned by navigating to Data > Assign Place Names > Selecting and opening the file. The Input field should be set to "ZIP". The default place name classification "STD_CLASS" will assign a Urban (U), Suburban (S), or Rural (R) designation to ZIP codes consistent with the definitions specified in 42 CFR § 423.100.</p>
5	<p>The Quest Analytics Suite automatically assigns geocodes at runtime using a zip code "distribution" method when no address information is provided in the file (i.e., in this instance).</p>	<p>If geocodes are not assigned when the population file is created, Applicants may assign geocodes by navigating to Data > Assign Geocodes > Select and open file > Click OK. Applicants must use "representative" geocoding as the method to assign locations to each record in the Population file. This is the default GeoNetworks® method of assignment of geocodes when no address information is provided in the file (i.e., in this instance).</p>

6	Unnecessary/Completed in Step One	Applicants must define one employee group for all beneficiaries using the Medicare Beneficiary File Extract used in their analyses. The "all beneficiaries file" is used in the service area report.
7	Unnessary/Completed in Step One	Define a single "all beneficiaries file" by navigating to Define > Employee Groups > Add > on the Connection tab, select the data source > on the Filter Tab <u>no</u> tests should be set > Under the Options tab, enter the label of "All Beneficiaries" in the Description field and specify that Service Area Restriction is set to "inside"> click OK.
8	Applicants must define three subsets of the Medicare Beneficiary File Extract used in their analyses. These subsets are based on filtering on the designation of urban/suburban/rural assigned in the step above. These three subsets are used in the accessibility reports.	
9	To define the subset of Urban beneficiaries, navigate to Employee Groups resource and Copy the All Beneficiaries group. Change the name to "Urban Beneficiaries" and on the zip code filter, turn off the suburban and rural check boxes.	To define the subset of Urban beneficiaries, navigate to Define > Employee Groups > Add > on the Connection tab, select the data source > on the Filter Tab, select "filename.STD_CLASS" as the field > "Test" should be "=" (equal to) > Value should be 'U' (Note: the single quotes signify a text field) > Under the Options tab, enter the label of "Urban Beneficiaries" in the Description field and specify that Service Area Restriction is set to "inside"> click OK.

10	To define the subset of Suburban beneficiaries, navigate to Employee Groups resource and Copy the All Beneficiaries group. Change the name to "Suburban Beneficiaries" and on the zip code filter, turn off the urban and rural check boxes.	To define the subset of Suburban beneficiaries, navigate to Define > Employee Groups > Add > on the Connection tab, select the data source > on the Filter Tab, select "filename.STD_CLASS" as the field > "Test" should be "=" (equal to) > Value should be 'S' (Note: the single quotes signify a text field) > Under the Options tab, enter the label of "Suburban Beneficiaries" in the Description field and specify that Service Area Restriction is set to "inside"> click OK.
11	To define the subset of Rural beneficiaries, navigate to Employee Groups resource and Copy the All Beneficiaries group. Change the name to "Rural Beneficiaries" and on the zip code filter, turn off the urban and suburban check boxes.	To define the subset of Rural beneficiaries, navigate to Define > Employee Groups > Add > on the Connection tab, select the data source > on the Filter Tab, select "filename.STD_CLASS" as the field > Test should be "=" (equal to) > Value should be 'R' (Note: the single quotes signify a text field) > Under the Options tab, enter the label of "Rural Beneficiaries" in the Description field and specify that Service Area Restriction is set to "inside"> click OK.
12	Verify that the urban, suburban, and rural definitions are defined appropriately for each page of the report. CMS will compare the total of urban, suburban, and rural beneficiaries for specific counties to totals derived from the Medicare Beneficiary File.	Verify that the urban, suburban, and rural definitions are defined appropriately for each page of the report. CMS will compare the total of urban, suburban, and rural beneficiaries for specific counties to totals derived from the Medicare Beneficiary File.
13	The Quest Analytics Suite automatically restricts beneficiaries inside your service area.	Verify that only beneficiaries within your service area are included in the report. This setting can be checked under the Options tab, in the Service Area Restriction box. The "within" radio button should be selected.
Defining the Provider File		
Step	Quest Analytics Suite	GeoNetworks

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	Applicants must use their listing of contracted Part D retail pharmacies. The listing used in these analyses must be consistent with the pharmacy listing provided under the instructions in Section 3.4.1C of this solicitation that includes address information to define their provider file. If an Applicant used more than one retail pharmacy network to provide the Part D benefit, the network must be combined in the analysis (and the submission provided under Section 3.4.1B of this solicitation to represent one complete Part D network).	
1	Applicant may use representative ZIP Geocoding or the more precise geocoding methods for pharmacy providers (i.e., the ZIP+ 4 Centroid Method, the ZIP+2 Centroid Method, or address-based geocoding). CMS strongly encourages the use of more precise methods for geocoding. Use of address-based geocoding will prevent, in some market areas, false indications that access standards are not met.	
2	The Quest Analytics Suite will automatically geocode your provider file using an "address-based" method (if licensed). If this function is not available on your version of Quest Analytics Suite, the default, distributive geocoding methodology, is acceptable.	Define Geocodes for their provider file by navigating to Data > Assign Geocodes > Select and open the provider file > Click OK. To the extent possible, CMS recommends that Applicants use “address-based” geocoding as to assign locations to pharmacies as it is more precise. If this function is not available on your version of GeoNetworks®, the default, representative geocoding, methodology is acceptable.
3	Define the Provider Group by navigating to Add Provider Groups. Select the data source on the Source Table button. On the Name enter the label of “Part D Retail Pharmacy Network”, select OK.	Define the Provider Group by navigating to Define > Provider Groups > Add > on the Connection tab, select the data source > on the Options tab, enter the label of “Part D Retail Pharmacy Network” in the Description field > Select OK.
4	Verify that the total counts for pharmacy providers in the report do not exceed the count of pharmacies in your Part D contracted retail pharmacy listing that must also be provided using the retail listing template provided in HPMS	
	Defining Access Criteria	
Step	Quest Analytics Suite	GeoNetworks
	The Applicant must define access standards in accordance with the Part D standards, as defined in 42 CFR § 423.120 (a)(1).	

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1	The Urban access standard of 1 provider within 2 miles is predefined within the Quest project file that you downloaded.	To define the Urban access standard, navigate to Define > Access Standards > Add > in the Description field, type “Urban: 1 provider within 2 miles” > Ensure that the Number of Providers is 1, the Test is within, and Miles is 2 > Click OK.
2	The Suburban access standard of 1 provider within 5 miles is predefined within the Quest project file that you downloaded.	To define the Suburban access standard, navigate to Define > Access Standards > Add > in the Description field, type “Suburban: 1 provider within 5 miles” > Ensure that the Number of Providers is 1, the Test is within, and Miles is 5 > Click OK.
3	The Rural access standard of 1 provider within 15 miles is predefined within the Quest project file that you downloaded.	To define the Rural access standard, navigate to Define > Access Standards > Add > in the Description field, type “Rural: 1 provider within 15 miles” > Ensure that the Number of Providers is 1, the Test is within, and Miles is 15 > Click OK.
Defining the Plan Service Area		
Step	Quest Analytics Suite	GeoNetworks
1	Applicants should define their service area based on the service area for the entire contract. The service area defined in your report must EXACTLY match the service area you have specified in HPMS.	
PDP Applicants		
Step	Quest Analytics Suite	GeoNetworks
1	PDPs and RPPOs are required to demonstrate the accessibility standards at the state level. Applicants must also present access statistics at the county level. Please note that it is not a requirement for PDP (or RPPO) Applicants to provide summary statistics related to the accessibility standards at the region level.	
2	Define the service area by navigating to Service Area and Add and select your service area.	Define the service area by navigating to Define > Service Areas > Add > Use buttons on right to select your service area.

3	Verify that the service area defined in your report EXACTLY matches the service area you have entered in HPMS. New applicants MUST include all regional (and their component States) in their report. SAE applicants MUST include only new regions (and their component States) in their report.	
4	Verify that the reports provided to CMS include subtotals for each individual state and grand total summary statistics encompassing all states in the service area. For SAE applicants the reports provided to CMS should include subtotals for each individual state and grand total summary statistics encompassing all states in the expansion area.	
	Generating the Accessibility Analyses Reports	
Step	Quest Analytics Suite	GeoNetworks

5. Generating the Accessibility Analyses Reports

A. Using The Quest Analytics Suite - A report template is included in the Quest Analytics project file that you downloaded. This includes all the report pages and access standards along with the applicable sorting options.

B. Generating the Accessibility Analyses Reports in GeoNetworks® - following the specific instructions below.

PDP Reports

Including the title, the table of contents, and the GeoNetworks run report, a seven (7) item report must be generated. The following set of instructions references the CMS example for S0000 and, following all of the report development specifications, should result in the items listed in Table I. Please note that while the example and corresponding instructions reference a PDP submission, the same instructions apply for preparing an RPPO submission. Applicants should ensure that they: (1) use the appropriate employee group (i.e. the Beneficiary Count file you derived from the CMS provided reference file), (2) use the correct definition of the access standards, (3) use the correct definition of your service area (including both current and SAE areas for SAE Applicants); and (4) provide analyses with "all" beneficiary specification in order to provide CMS with a summary of the service area included in your report. (5) CMS also requests the inclusion of the summary report that provides information about the set-up and run date of the analysis. This summary report is automatically generated by GeoNetworks®. An example of the PDP GeoAccess reports with the file name, "Example PDP GeoNetworks Analysis.tif" accompanies this document.


Table I
Example S0000 Report Pages Specification

Rpt #	Page	Summarized by	Employee Group	Provider Group	Access Standard	Service Area / Title 1	Access Filter
1	Title						
2	Table of Contents						
3	Accessibility Detail	County	Urban PDP Region 05 Beneficiaries	PDP Region 05 Part D Retail Pharmacy Network	Urban: 1 provider within 2 miles	S0000	All
4	Accessibility Detail	County	Suburban PDP Region 05 Beneficiaries	PDP Region 05 Part D Retail Pharmacy Network	Suburban: 1 provider within 15 miles	S0000	All
5	Accessibility Detail	County	Rural PDP Region 05 Beneficiaries	PDP Region 05 Part D Retail Pharmacy Network	Rural: 1 provider within 15 miles	S0000	All
6	Service Area	State	All Beneficiaries	Part D Retail Pharmacy Network		S0000	
7	GeoNetworks Report (auto generated summary information report to be included in submission)						

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- Title Page
 - To add a title page, navigate to Page > Add > Title Page.
- Table of Contents
 - To add a table of contents, navigate to Page > Add > Table of Contents. Double click on the new Table of Contents page. Under the Options tab select Tab leaders, Page specifications, and Roman page numbers to be included in the report.
- Accessibility Detail pages should be generated to represent urban/suburban/rural beneficiaries with and without access the service area defined. There should be three Accessibility Detail reports. The title in the accessibility detail report should specify the network represented in the pharmacy list. For each accessibility analysis, a report is created that provides the percentage of beneficiaries with access and the percentage of beneficiaries without access. Both the with and without access statistics should appear together on each of the urban/suburban/rural reports. Statistics for **each individual county** within the service area and statistics for **each State** (in total) must be provided.
 - Defining the accessibility detail report for urban beneficiaries in the service area for S0000 requires the following steps:
 - Navigate to Page > Add > Accessibility Detail > Double click on the page that appears
 - Under the Specifications tab for the new Accessibility Detail Page set Employee Group to be your urban beneficiaries, set Provider Group to be “Part D Pharmacy Network 1”, set Access Standard to be “Urban: 1 provider within 2 miles”, set Access filter to “all”, and set Service Area to S0000
 - Under the Options tab for the new Accessibility Detail Page, select to summarize by county, and under show, ensure that the following options are checked: state, percent in filter, number in filter, number of providers, subtotals and totals.
 - Under the Titles Page, uncheck the default Title 1 and specify a title that describes the unique service area. In this instance the title would be “PDP Region 05: Mid-Atlantic (DE, DC, MD)”
 - The steps above are repeated, with appropriate modifications, for suburban and rural beneficiaries.
- The steps to define the service area report for all beneficiaries with access in the region for S0000 are as follows:
 - Navigate to Page > Add > Service Area Detail > Double click on the page that appears.
 - Under the Specifications tab for the new Service Area Detail Page set Employee Group to be all beneficiaries, set Provider Group to be “Part D Retail Network 1”, set Service Area to S0000.

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- Under the Options tab for the new Service Area Detail Page, select to summarize by state, set service area filter to inside, ensure that the following options are checked: number of employees, number of providers, and totals.
 - Under the Titles tab, uncheck the default Title 1 and specify a title that describes the service area. In this instance the title would be “PDP Region 05: Mid-Atlantic (DE, DC, and MD)”.
 - Ensure that no specifications are indicated under the Include tab.
 - Under the Sort tab ensure that sort order is State (ascending), then County (ascending).
 - As part of the submission for each contract report Applicants should include the “Report Information” page. This page is generated automatically when the GeoNetworks® report is run.

6. Providing copies of the Analysis to CMS for review

Applicants must upload their report in Adobe Acrobat readable (*.pdf) format into HPMS.