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CMS Eyeing Part D Performance Measures

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Washington — Medicare intends to use performance measures to monitor cost, quality, and access issues related to the new prescription drug benefit, a research analyst indicated during a meeting of the Medicare Payment Advisory Commission

However, Medicare has not yet "determined what those measures will be and

how they will be used," said MedPAC analyst Cristina Boccuti. MedPAC makes recommendations to Congress on Medicare payment issues.

The Centers for Medicare and Medicaid Services will be collecting a large amount of data on the new drug benefit—or Medicare Part D—including drug utilization and plan benefit information, to construct these performance measures, Ms. Boccuti said. In addition to the agency's need for the data, "congressional agencies

will need Part D data to report to the Congress on the impact of the drug benefit on cost, quality, and access," she

MedPAC commissioners recommended that the Department of Health and Human Services establish a process for the timely delivery of these data to interested parties.

Individuals, employers, and government agencies currently use performance measures to evaluate how well health plans and pharmacy benefit managers manage drug benefits, Ms. Boccuti said.

To identify how policy makers could use these measures to monitor the Part D program, MedPAC convened a panel of 11 experts representing health plans, pharmacy benefits managers (PBMs), employers, pharmacies, consumers, quality assurance organizations, and researchers. The panel members analyzed measures including cost control, access and quality assurance, benefit administration and management, and enrollee satisfaction.

Based on the panel's findings, CMS plans to collect data on the following:

- ▶ Dispensing fees, generic dispensing rates, aggregate rebates, drug claims, and drug spending by plans and beneficiaries.
- ▶ Pharmacy networks, formularies (including prior authorization and excep-

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tions), appeals rates, and drug utilization.

- ► Claims processing, including plans' outo f p o c k e t calculations.
- ► Beneficiary satisfaction, grievances, call center operations, and disenseliment rates.

Measures to

track beneficiary satisfaction—such as member satisfaction surveys and performance of customer service call centers—are common types of performance guarantees that health plans and PBMs offer to their clients, Ms. Boccuti said.

CMS plans on conducting its own consumer satisfaction surveys to provide comparative plan information to beneficiaries when they're making enrollment decisions, she said.

In addition, plans will submit data on grievances filed, and call center performance measures, such as abandonment rates and hold times.

MedPAC commissioner Nancy-Ann De-Parle, a health care consultant in Washington and former head of CMS' predecessor agency (the Health Care Financing Administration), asked whether CMS would be looking at this data at a physician level, in terms of who did the prescribing. "In our pay-for-performance discussions around physicians, [MedPAC indicated that] it would be useful to have this."

Ms. Boccuti noted that there is a prescriber code associated with each drug.

On the issue of collecting data on cost, Ms. DeParle said that she wondered whether CMS would be able to assess whether particular plans were getting a "good deal" on the drugs they purchased. "Will they know by drug?" Ms. Boccuti asked

The agency is preparing to collect data on actual drugs and the spending associated with those specific drugs, "so there will be the ability to track how much was paid at the point of sale," Ms. Boccuti said.

