

**30.8 – *Mid-Year MTMP Changes***  
***(Rev. 11, Issued: 02-19-10, Effective/Implementation Date: 03-01-10)***

*Once an MTMP is approved by CMS during the Annual Review, limited changes to the Part D sponsors' MTMP may be allowed in accordance with CMS policy. To promote evolving MTM best practices and to serve the best interests of the Medicare beneficiary, CMS allows certain mid-year changes to Part D sponsors' approved MTMPs during three Update Cycle windows: **March 1-March 10, June 1-June 10, and September 1-September 10.** All proposed MTMP changes must be submitted to CMS for review and approval prior to the implementation of requested changes.*

CMS has a four part policy regarding MTMP changes during the program year or prior to the start of the upcoming program year.

1. Part D sponsors may make positive changes to the plan-designed eligibility criteria for multiple chronic diseases, multiple covered Part D drugs, or analytical procedures used to determine if a beneficiary is likely to incur annual costs in excess of a predetermined level as specified by the Secretary. These changes would make eligibility for the MTMP more inclusive and could increase the number of beneficiaries eligible to receive Part D MTM services. Positive changes may include:
  - Decreasing the minimum number of multiple chronic diseases.
  - Expanding the list of specific chronic diseases that apply.
  - Decreasing the minimum number of multiple covered Part D drugs.
  - Expanding the list of specific covered Part D drugs, or types of drugs, that apply.
2. Part D sponsors may make program enhancements or maintenance changes, including changes to:
  - *Frequency of-* identification *of potential enrollees* to increase or promote ease of beneficiary participation.
  - Expand the levels of intervention or services provided to participating targeted beneficiaries.
  - Methods of documenting and measuring outcomes.
3. Part D sponsors may make changes to the following:
  - The provider of MTM services.

- Any fee schedules established for pharmacists and other MTM providers if using outside personnel. CMS will request that Part D sponsors disclose the newly established fees for outside personnel.
4. Part D sponsors may not make any negative changes to their MTMP. While the following list is not exhaustive, potentially negative changes include those that:
- Promote discriminatory or exclusionary practices.
  - Decrease the number of enrollees eligible for MTM services.
  - Lower quality or robustness of MTM services.

*MTMP requests for changes during the program year may be submitted to CMS during **any of the three Update Cycle windows: March 1-March 10, June 1-June 10, and September 1-September 10.** Requests for changes to an approved MTMP that would be effective for an upcoming program year should be submitted to CMS during the **September 1-September 10** update cycle window.*

*The MTMP change request should be submitted through the HPMS in the MTMP submission module under “Plan Formularies.” This interface was established to enable Part D sponsors to enter, edit, and submit their MTMP descriptions within HPMS at the contract level. The ‘MTMP Change Request Form’ is now integrated within the enter/edit function of the MTMP submission module for the Update Cycles. The MTMP submission gates to enter/edit the MTMP will automatically be open during the Update Cycle windows. For any submissions made in the Update Cycles due to updates, required resubmissions, and contract exceptions, a sponsor is required to enter information in the Change Request Form Description field(s) to justify the change on the Enter/Edit pages and check the attestation, “I attest that the following change(s) do not impact approved MTM marketing materials or such marketing materials will be submitted and approved by CMS as necessary prior to implementation of the change” on the Verify Submission page.*

Part D sponsors will receive an email correspondence regarding the approval of the MTMP change request. Part D plans must not implement changes until they receive explicit notification of approval from CMS, and must not include any changes in marketing material until receiving explicit and affirmative CMS approval. Depending upon the number of submitted requests, plans should expect a response within 30 days. A memo containing information and additional instruction related to Part D MTMP change requests is posted at MTMP Web page, see Appendix A.