DEPARTMENT OF HEALTH & HUMAN
SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850

CENTER FOR MEDICARE

DATE: November 1, 2024

TO: All Part D Plan Sponsors, including PACE Organizations

FROM: Jennifer R. Shapiro, Director, Medicare Plan Payment Group

SUBJECT: Attestation of Prescription Drug Event (PDE) Data and Direct and Indirect
                Remuneration (DIR) Data related to the 2019 Reopening

On May 9, 2024, the Centers for Medicare & Medicaid Services (CMS) released the memo
"*Guidance for the Part D Payment Reconciliation Reopening for Calendar Year 2019 and
Future Years*," which announced a global reopening of the 2019 Part D payment reconciliation.
Since this is a global reopening, all Part D sponsors that were active in 2019 (**including PACE
organizations**) must sign the *Attestation of Data Relating to CMS Payment to a Medicare Part
D Sponsor*. The attestation will be available through the Health Plan Management System
(HPMS) on November 1, 2024. Part D sponsors must electronically sign the attestation in HPMS
by **noon ET, November 8, 2024**.

CMS requires that the Part D sponsor's Chief Executive Officer (CEO), Chief Financial Officer
(CFO), or Chief Operating Officer (COO) electronically sign the *Attestation of Data Relating to
CMS Payment to a Medicare Part D Sponsor* in order to receive risk sharing and reinsurance
payment adjustments resulting from the reopening of the 2019 Part D payment reconciliation.
Per 42 C.F.R. 423.505(k)(3) and (5), Part D sponsors are required to certify the claims data and
allowable costs it submits for purposes of risk corridor and reinsurance payment. By
electronically signing the attestation, the Part D sponsor certifies that Prescription Drug Event
(PDE) data, Direct and Indirect Remuneration (DIR) data, and any other information provided
for the purposes of determining allowable reinsurance and risk corridor costs are accurate,
complete, and truthful. In addition, the Part D sponsor acknowledges that this information is used
for purposes of obtaining federal reimbursement.

Please see Attachment I for instructions on signing the attestation. Direct questions concerning
this memorandum to PDE_DIR_Attestations@cms.hhs.gov.

Thank you

Attachment (1)

Instructions for electronically signing the *Attestation of Data Relating to CMS Payment to a Medicare Part D Sponsor* **Due by noon ET, November 8, 2024**

All Part D sponsors who offered an active Part D plan in 2019 must electronically sign the attestation in HPMS. This attestation will become available on November 1, 2024, and may be accessed through HPMS using the following navigation path: HPMS Homepage > Plan Bids > Part D Attestations > (on the right) Contract Year: (select 2019). One attestation should be signed per Parent Organization per contract year. Part D sponsors offering multiple contracts should submit one attestation for all contracts combined for the applicable contract year.

HPMS pre-populates the Parent Organization name with the name that was in effect for 2019. The current Parent Organization name may differ from the historical Parent Organization name. Current and past Parent Organization names may be verified in HPMS by viewing the Parent Org Contract-Plan Report. This report is located at the following path: HPMS Home Page > Plan Bids > DIR Reporting > (on the right) Contract Year: (select 2019) > Reports > (Report Type) General Reports > (Select a Report) Parent Org Contract-Plan Report > (Select Type – By Contract or By Parent Organization). If the Parent Organization name is incorrect, please contact PartD_Monitoring@cms.hhs.gov.

Please Note: This attestation may not be substituted or revised. If the Parent Organization name is incorrect on the attestation and cannot be corrected in HPMS, sponsors may submit an attachment to the attestation providing legal documentation of the correct Parent Organization name. Likewise, if a Part D sponsor is aware of an error or potential error in the PDE data submitted to CMS for 2019, has notified CMS of this error, and is working to rectify this error, the Part D sponsor may submit an attachment to the attestation. The attachment describes the error, the magnitude of the error, and timeline and expectations for resolving this problem. The Part D sponsor must also indicate that CMS has received prior notification of the identified or potential error.

1. Access the PDE/DIR Attestation in HPMS using the following navigation path: HPMS Homepage > Plan Bids > Part D Attestations > (on the right) Contract Year: (select 2019) > Submission > Submit PDE/DIR Attestation. Please Note: Only the CEO, CFO, or COO will be able to view or access this path in HPMS.

2. Select Parent Organization.

    If the Parent Organization is not listed, please contact the HPMS Access team at HPMS_Access@cms.hhs.gov.

3. Select all applicable contracts under the Parent Organization.

    If any of the contracts offered by the organization in 2019 are not listed, please contact the HPMS Access team at HPMS_Access@cms.hhs.gov

4. Review the following:

    a. Contract Numbers Listed

b. Organization Name
c. Date(s) of Last Successful 2019 DIR Data Submission

5. If there are attachments to the attestation, save the attachments in a zip file.

An attachment should be uploaded *only* if:

a. The Parent Organization name is incorrect; or
b. The Part D sponsor is aware of an error or potential error in the PDE data submitted to CMS for contract year 2019, has notified CMS of this error, and is working to rectify this error.

6. The signer must enter his/her title.

7. The CEO, CFO, or COO must electronically sign the attestation. By selecting the "Submit" button, the attestation is signed electronically.

8. Review the attestation and, if applicable, the attachment to the attestation using the PDE/DIR Attestation Submission or History reports in HPMS.