

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



CENTER FOR MEDICARE

DATE: February 22, 2024

TO: All Current and Prospective Medicare Advantage (MA), Prescription Drug Plan (PDP), Cost, Programs for All-Inclusive Care for the Elderly (PACE), and Medicare-Medicaid Plan (MMP) Organizations

FROM: Vanessa S. Duran
Acting Director, Medicare Drug Benefit and C & D Data Group

SUBJECT: Annual Verification of Parent Organization and Legal Entity Name

All current and prospective MA, PDP, Cost, PACE and MMP organizations (“contracting organizations”) are requested to conduct their annual review of the parent organization and legal entity name as listed in the Health Plan Management System (HPMS), and to **report any necessary corrections by March 20, 2024**. The legal entity name for a contracting organization is the organization’s name as it appears on official documents, such as articles of incorporation or licenses, not the marketing or “dba” name. The parent organization, as defined at 42 CFR §422.2 and § 423.4, “Means the legal entity that exercises a controlling interest, through ownership of shares, the power to appoint voting board members, or other means, in a Part D sponsor or MA organization, directly or through a subsidiary or subsidiaries, and which is not itself a subsidiary of any other legal entity.”

It is crucial that all contracting organizations accurately report their parent organization status and legal entity name to the Centers for Medicare & Medicaid Services (CMS). Contracting organizations should keep that information up to date by reporting changes as soon as they occur. Parent organization assignments and legal entity names are maintained within the Basic Contract Management Module in HPMS and can be accessed by following this navigation path: Contract Management > Basic Contract Management > Select Contract Number > General Information > Plan Management Data. Parent organization and legal entity name data are also available by following this path: Contract Management > Contract Reports > Contract and Plan Summary Reports > General Information Report. Organizations do not have access rights to change the parent organization designation or legal entity name, but instead must report changes to CMS.

In those instances where the parent organization or legal entity field is blank or incorrect, please notify CMS of the correct information by sending an email to PartD_Monitoring@cms.hhs.gov by **March 20, 2024**. If any changes in parent organization identity or legal entity name occur after this date, please notify CMS of the change by sending an email to

PartD_Monitoring@cms.hhs.gov as soon as the change occurs, but no later than 30 days from the effective date of such a change.

When reporting a parent organization or legal entity name change or correction, include your contract number(s) and the phrase “parent organization update” or “legal entity update” in the subject line of the email. Please indicate what prompted the change (e.g., merger, sale, or corporate name change) and include contact information for someone at your organization whom we could call to discuss any discrepancies you identify. Be sure to include documentation to support the change or correction, such as financial statements, signed copies of the articles of incorporation or certificate of good standing, contracts, or filings with regulatory authorities. All documents submitted must display the official state seal or the Secretary of State’s signature. Of note, due to character limitations in CMS information systems, CMS may not agree to all minor changes, such as requests to expand abbreviations.

Please contact PartD_Monitoring@cms.hhs.gov with any questions.