

# **Help Crosswalked Medicare Drug Plan Beneficiaries**

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## The Situation

- Insurer discontinues one of its Medicare Prescription Drug Plans (PDPs) for the next calendar year
- The beneficiary is **crosswalked** to a another of its PDPs
- Enrollees are notified via the Annual Notice of Change (ANOC) mailing in September
- In 2021, 3.2 million PDP enrollees were crosswalked to a different PDP for 2022

## The Problem

- Sometimes the ANOCs are confused with junk mail
- The same ANOC formats are sent out every year to all Part D enrollees
- The choice presented is confusing
- Beneficiaries are not given proper guidance

## A Typical Example\*

- Mutual of Omaha Rx Value Plan in 2020 → Mutual of Omaha Rx Plus Plan in 2021
- Switched from one of the lowest cost plans in area to one of highest

*\*Full document is provided with these slides.*

## Guidance Provided in the ANOC Is Challenging\*

- Check changes to benefits & costs to see if they affect you
  - Will your drugs be covered? – *see online “drug list”*
  - Are your drugs in a different tier, with different cost-sharing? – *5 tiers, 10 cost-sharing categories*
  - Do any of your drugs have new restrictions? – *need to call*
  - Can you keep using the same pharmacies? – *see website or call for a directory*
- “Additional Resources” -- *call the insurer’s customer service*

\* Wording of ANOCs is prescribed by a CMS template

# **What Should NAIC Do?**

**Ask CMS to Implement 3 Straightforward Changes**

# 1. Notify Crosswalked Part D Enrollees Directly

- ANOCs are less likely to be treated as junk mail & to be read, if they are preceded by a letter from CMS
- Message\*
  - Your current Part D drug plan is being discontinued
  - You will be assigned a new plan, unless you sign up for a different one during Medicare open enrollment
  - Compare your Part D options
  - Resources to help you compare and enroll in a different plan, including your state SHIP.

*[ See letter provided with these slides for possible wording.]*

## 2. Modify the CMS ANOC Template

- Under “Additional Resources”, the template lists:
  - The document is available in Spanish, braille, large print & other formats.
  - The insurer’s Customer Service number
- Add at the beginning of that section
  - For help understanding this notice, call your State Health Insurance Assistance Program at <SHIP phone number> for free, personalized health insurance counseling or call 1-800MEDICARE (1-800-633-4227) for help.
  - [www.medicare.gov](http://www.medicare.gov) provides information to help you compare the plan you were assigned with all your other options.



### 3. Provide Same Open Enrollment Period That Medicare Advantage Enrollees Have

- Allow crosswalked Part D plan enrollees to switch Part D plans during Jan-March each year
- Add to Medicare regulations
- Or request inclusion with future Medicare amendments.

# Summarizing

- Tell CMS to give crosswalked Medicare Part D drug plan enrollees the same protections as those in MA plans.
  - Precede drug plan ANOC mailing with a simple CMS letter.
  - Give crosswalked Part D enrollees the opportunity to switch plans during the first 3 months in their newly assigned plan
  
- Ask CMS to modify its Part D ANOC template to better highlight objective resources available to them
  - SHIPs
  - 1-800-MEDICARE
  - [www.Medicare.gov](http://www.Medicare.gov)