

High-Level Summary of Changes in Employer/Union-Only Group Waiver Plan Part D Applications

Clarification	Purpose	Application Section			
		“800 series” PDP	“800 series” Cost	Direct Contract PDP	Direct Contract MA-PD
Added clarifying language that distinguished the pharmacy access submittal policy between applicants that are only offering “800 series” plans (no individual plans) and applicants that offer individual plans and “800 series” plans. Applicants offering only “800 series” plans will be required to submit pharmacy access information for the entire EGWP service area during the application process and demonstrate sufficient access in these areas in accordance with employer group waiver pharmacy access policy. Applicants offering individual plans and “800 series” plans will not initially be required to submit pharmacy access for areas outside of their individual plan service area but will be required to have networks in place prior to enrolling beneficiaries in any expanded EGWP service areas.	This will clarify the pharmacy access information the applicant needs to submit.	Instructions (p. 4) EGWP Service Area & Pharmacy Access Requirements (p. 7) Certification # 5 (p. 9) Certification # 6 (p. 9)	N/A	N/A	N/A
Added clarifying language that the applicant’s employer/union-only group waiver plan will not be subject to the Part D beneficiary customer service call center hours and call center performance requirements.	Waiver makes this attestation in the application inapplicable.	Certification # 14 (p. 10)	Certification #11 (p. 9)	Certification # 14 (p. 18)	Certification # 13 (p.13)
Added clarifying language that Applicant is not required to submit Part D bids (i.e. bid pricing tool).	As per CMS Guidance Issued Via the Health Plan Management System (HPMS), dated 4/3/2007.	Certification # 4 (p. 8)	Certification # 4 (p. 7)	Certification # 4 (p. 16)	Certification # 4 (p. 12)

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Added clarifying language that the option to pay premiums through Social Security withholding will not be available to any EGWP enrollees.	Waiver makes these attestations in the applications inapplicable.	Certification # 15 (p. 11)	Certification # 12 (p. 9)	Certification # 9 (p. 17)	Certification # 8 (p. 12)
Added clarifying language that Applicant should designate national service area in HPMS in order to provide coverage to employer group members wherever they may reside (no mid-year service area expansions will be permitted).	This will clarify service area requirements.	Instructions (p. 4) EGWP Service Area & Pharmacy Access Requirements (p. 7)	N/A	N/A	EGWP Service Area & Pharmacy Access Requirements (p. 11)
Requested additional organizational information from Employer/Union Direct Contract applicant that requests waiver of licensure requirements.	This will aid in the evaluation of Applicant's financial solvency and capital adequacy.	N/A	N/A	Appendix I: Part D Financial Solvency and Capital Adequacy Documentation (p. 6-8)	N/A
Eliminated request for organizational information from Employer/Union Direct Contract MA-PD applicant that requests waiver of licensure requirements.	Information already requested in Employer/Union Direct Contract PFFS MAO Application.	N/A	N/A	N/A	Appendix I: Part D Financial Solvency and Capital Adequacy Documentation (p. 5)

Note:

Changes from 2008 Applications are in black.

Changes from PRA 60 day posting for 2009 Applications are in red.