

**Subject: Posting of PA Criteria to Plan Websites  
October 15, 2008**

The purpose of this notice is to provide MedImpact Formulary clients with information regarding the CMS 2009 requirement to post PA criteria on the plan website.

On Page 56 of the CY 2009 Call Letter, CMS states:

*CMS also is establishing a new requirement that Part D sponsors post their approved PA criteria on Part D plan websites. In a previous HPMS memorandum, CMS indicated that Part D sponsors must provide current and prospective enrollees (or their physician or authorized representative) with information regarding specific PA criteria in a timely manner. Given the uniformity that will result from Part D sponsor utilization of the 2009 CMS standardized file, we believe that webpage posting of this information will augment the Part D sponsor's ability to rapidly provide this information, improve transparency and allow Part D plan comparison during enrollment. Accordingly, for CY2009, Part D sponsors will need to ensure that approved PA criteria are available on their Part D plans' formulary websites for display on November 15, 2008. CMS expects Part D sponsors to make these criteria available for beneficiary viewing either from a link when the drug identified with PA is displayed or from a general link on the formulary page. Part D sponsors will be expected to display all of the PA criteria contained within the CMS approved HPMS-PA file without modification.*

However, in the September 19, 2008 memo entitled "CY2009 Formulary Enhancement Window and Marketing Information", CMS further clarifies the guidance related to PA website posting to include the following:

***Q7: Regarding the posting of PA criteria on Part D plan websites, does criteria need to be posted if the PA requirement is a Part B versus Part D determination only?***

***A7: Yes. For drugs identified as PA Type 3 on the HPMS formulary file (Part B versus Part D PA only), the following statement must be included on Part D plan websites as the PA criteria for those drugs: "This drug may be covered under Medicare Part B or D depending upon the circumstances. Information may need to be submitted describing the use and setting of the drug to make the determination."***

**Because PA Type 3 drugs do not exist on the 2009 CMS standardized file format, this file can no longer be used as is to meet CMS's updated requirements.**

To assist our Formulary clients in meeting this requirement, MedImpact Formulary Services will produce and provide a modified version of the CMS PA file, inclusive of the new PA Type 3 requirement. The file will be provided in a tab delimited text format to facilitate embedding in your plan website.

Formulary Services expects to produce and release this file in early November for your use in posting to your Plan's website.

If you have any questions, please contact Formulary Services at [FMT@medimpact.com](mailto:FMT@medimpact.com)

Thank you.