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Surviving the 2015 AEP materials creation process

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By Debbie R. Mabari

The Centers for Medicare & Medicaid Services (CMS) recently released its model documents for the 2015 Annual Enrollment Period (AEP). The rigorous, highly complex rules and regulations for member marketing materials wreak havoc on health plans year after year. The clock is now ticking.



Medicare plans must create, print and deliver AEP materials, specifically, Annual

Notification of Change (ANOCs) and Evidence of Coverage (EOCs), to members by September 30. Preparing

AEP materials can be a time-consuming, labor-intensive process and wrought with compliance risk.

Here are three tips for the best chance of making it through AEP on schedule and in compliance, while maintaining your sanity throughout the process:

1. Create a Comprehensive Task List and Timeline

From data entry to PBP reports to subject matter expert input to compliance approval, numerous tasks, and various departments and people, are involved in creating AEP materials from start to finish. Having a well-thought-out production timeline will help ensure your materials are completed on time and are compliant.

AEP materials must be in members' hands by September 30 – that is the date from which you should work backward when developing your timeline. Set a deadline for each task involved in the production schedule to stay on track. And be sure to leave plenty of time for subject matter experts to review materials, and, likely, make lots of changes. Also schedule time for CMS to review materials (more on that below) and for your print and fulfillment vendor to print and mail the materials.

Consider using a program that allows you to assign tasks, people and deadlines to ensure streamlined project management. A comprehensive tool that helps a team track progress and signals alerts when you've fallen behind can make your job infinitely easier.

2. Use the 2015 Model Documents

Some health plans may be tempted to create their 2015 AEP materials by making updates to their 2014 templates. Many try to do this using a comparison tool that identifies the differences between the 2014 and 2015 documents, and updating information where needed.

With the ANOCs numbering between 8-20 pages, and the EOC documents ranging between 120-200 pages, this is an extremely risky method. If one data point of the thousands you update is missed, your health plan is out of compliance. This creates the need for issuing ERRATAs, a correction sheet plans must mail to all members informing them of errors in previously published materials. Your plan could also face costly fines from CMS.

Also, keep in mind that if you update the 2014 documents – or create any AEP materials that veer from the 2015 model documents provided by CMS – you are required to submit them to CMS for a 45-day review. This is a big chunk of time lost when you only have until the end of September to get these materials in your member's hands.

Using the 2015 model documents provided by CMS – which only requires a 10-day file and use approval period – is the least risky and most expeditious way to prepare your AEP materials.

3. Use a "Central Source of Truth" Data Grid for All Plan Benefit Information

Plan benefit information that must be included in members' ANOCs, EOCs and Summary of Benefits (SB) could have variables that number in the tens of thousands. With such a large number of data elements to manage, plans must use one "central source of truth" for benefit information if they expect to meet CMS's requirements.

It is risky and difficult to pull data from multiple sources when creating these documents. Not only is it difficult to discern what is the most current information, but it's also an extremely complicated process to ensure the materials are populated with the correct variables. And errors in materials lead to ERRATAs, and ERRATAs lead to fines from CMS.

Use one master grid for all plans. Populate your data grid correctly and then drop the variables into the templates. Consider using a tool that will help automate this process and ensure CMS compliance.

Debbie R. Mabari is CEO of Cody Consulting.

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