

## Creating Balance and Objectivity When Starting From an Uneven Statutory Platform: What can be done? MMAPA Response

**November 3 2014:** MMAPA submitted a special report to CMS regarding the differences in MA and Part D STAR rating quality measurements for dual eligible vs. non dual eligible beneficiaries. During the preparation for this report, we discussed the conclusions of intra-plan analysis performed by the major MA plans on the island. We also discussed the STAR rating analysis between the dual and non-dual population with other stakeholder leadership including community pharmacies, IPAs and physicians, and come to the following conclusions:

- Data from plans in Puerto Rico evidences the amount of **extra effort and investment needed to improve STAR ratings considering socio-demographic factors (income, education)**.
- The historical Medicare mandate of Coordinated Care of 1990 and the Medicare-Medicaid Integration Program since 2006 (Medicare Platino) have created a platform that fosters improved quality in the Dual program for Puerto Rico.
- STAR ratings in Puerto Rico are particularly affected by **approximately 50% of Non-Dual population who is also largely low income BUT does not receive the extra help** to pay for prescription drugs (NO Part D LIS and No Medicaid help).
- **The 550,000+ Medicare Advantage beneficiaries in Puerto Rico are affected by an unintended inequity in the STAR rating methodology due to 2 key facts:** (a) There is no socio-demographic adjustment and MA plans in Puerto Rico serve almost 50% dual eligible beneficiaries at 87% FPL and below (b) There is no equalizing adjustment in the STAR ratings to account for the recognized benefit disparity defined by law with the exclusion of the Part D LIS for residents of the Territories.
- Puerto Rico Medicare beneficiaries loss approximately \$120 million in benefits in the MA products of 2015 because of relatively lower STAR ratings which are impacted by these inequities.

**MMAPA has proposed fixes to CMS which would create a fair, objective and balanced solution for Medicare beneficiaries in Puerto Rico.** The following are part of the recommendations from The Coalition when it comes to the STARS quality program:

1. Adapt medication adherence thresholds for Puerto Rico Plans to adjust for benefit difference due to NO-LIS:
  - a. CMS should exclude medication adherence measures to avoid a double penalty that is unfairly lowering STAR ratings. Medication adherence performance could still be part of the improvement measure.
2. Include a socio-demographic adjustment to account for the extra effort needed to reach higher levels of performance within low income populations.

### What can you do?

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- **Talk about this issue**, and about the need to turn back these disproportionate cuts for beneficiaries that reside in the island.
- **Make your voice to be heard to support our parents, grandparents and friends with Medicare residing in Puerto Rico.**