

Centers for Medicare & Medicaid Services

CY 2022 Bid Review Out-of-Pocket Cost Model FAQs

1. **Question:** Does the Centers for Medicare & Medicaid Services (CMS) offer any alternative methods for calculating Out-of-Pocket Cost (OOPC) amounts for plan sponsors that do not have access to PC SAS?

Answer: CMS does not offer alternative tools for calculating OOPC values for plans that do not have access to SAS. We recommend that you continue to use the tools/methodology that you employed for calculating OOPC values for contract year (CY) 2021.

2. **Question:** What are the changes in the CY 2022 Bid Review Model compared with CY 2021 Baseline Model?

Answer: The CY 2022 Bid Review OOPC Model is an update of the CY 2021 Baseline Model delivered in December 2020. For the 2022 Bid Review OOPC Model, the items listed below summarize the changes that have been made.

- Updated the Part D policy parameters (deductible, initial coverage limit, etc.) to 2022 values.
- Updated Prescription Drug Event (PDE) data for drug price calculation. The CY 2022 Bid Review OOPC Model uses 2020 PDE data.
- Updated the Part D input data using the initial CY 2022 Formulary Reference File (FRF), released in March 2021 for 2022 bidding.
- Updated the code to take into account 2022 PBP data structure and variable name changes.

3. **Question:** Are Dual Eligible beneficiaries excluded from the OOPC Model estimates?

Answer: The OOPC tool will calculate the OOPC values for Dual Eligible SNPs. However, beneficiary data for dual eligible beneficiaries were excluded from the Medicare Current Beneficiary Survey (MCBS) data for the development of the OOPC model as it was deemed unrepresentative of the beneficiaries enrolling in these plans. Therefore, the resulting calculations may not be reliable for Dual Eligible SNPs. Please refer to the OOPC methodology document posted on the CMS website at:

<https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovGenIn/OOPCResources.html> for further technical details.

4. **Question:** Are Innovation Center models included in the OOPC Model estimates?

Answer: The reduced cost sharing for the Part D Senior Savings model drugs is reflected in the OOPC estimates. No other demonstrations are currently included in the OOPC model, such as Value Based Insurance Design or the Part D Payment Modernization model.

5. **Question:** Will the CY 2022 Bid Review OOPC Model work with older versions of SAS or SAS versions other than PC SAS (e.g., SAS running on UNIX or Mainframe)?

Answer: The CY 2022 Bid Review OOPC Model has been tested on PC SAS Version SAS 9.4 (the model also can be run using SAS Enterprise Guide). We expect the tool to run, with minor modifications, on older versions of SAS or SAS running on a different environment. However, CMS cannot guarantee a successful run.

Centers for Medicare & Medicaid Services CY 2022 Bid Review Out-of-Pocket Cost Model FAQs

6. **Question:** Will the CY 2022 Bid Review OOPC Model run on a networked version of SAS?

Answer: The model code is platform independent and should be able to be run in a network environment.

7. **Question:** What is the approximate amount of free disk space necessary for the model to run?

Answer: It has been recommended that the model requires at least 3GB of RAM and about 30GB of free disk space. However, the actual disk space requirements depend on the number of plans being run at one time and the particular hardware/software configuration of a user. In some cases, additional free disk space may be needed.

8. **Question:** Does the CY 2022 Bid Review OOPC Model require administrative rights on the computer to run?

Answer: Administrative privileges are not required to run this model on a PC.

9. **Question:** Does the CY 2022 Bid Review OOPC Model require any SAS add-ins to run? Is base SAS 9.4 sufficient?

Answer: Base SAS 9.4 (or SAS 9.3) with SAS/ACCESS Interface to PC Files installed is needed to run the model.

10. **Question:** How can organizations obtain information about policy related questions regarding standards for PDP meaningful difference and MA Total Beneficiary Cost (TBC)?

Answer: Organizations are encouraged to review the information provided annually by CMS and, if necessary, submit questions to the following mailboxes:

- For Part C policy related questions about TBC, please contact <https://mabenefitsmailbox.lmi.org/>
- For Part D policy related questions about meaningful difference, please submit an email to partdbenefits@cms.hhs.gov
- For technical questions about the Bid Pricing Tool, please submit an email to actuarial-bids@cms.hhs.gov
- For technical questions about the OOPC model, please submit an email to OOPC@cms.hhs.gov