

Part D exceptions and appeals

ISSUE: Access to prescription drugs under Part D depends on multiple factors. In the past, we have focused on plan formularies and use of utilization management tools. In this paper, we provide information on Part D's exceptions and appeals process and evaluate how well the process is working as a means of ensuring beneficiaries' access to prescription drugs.

KEY POINTS: We rely on available evidences from CMS' program audit, an analysis of Part D appeals and grievances data, and focus groups and interviews with beneficiaries, physicians, and beneficiary counselors to evaluate how well Part D's exceptions and appeals process is working. The paper provides a summary of findings and identifies aspects of the exceptions and appeals process that appear to have improved over time as well as areas where further improvements may be needed.

ACTION: Commissioners may want to discuss the findings on plan performance regarding the exceptions and appeals process.

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