

2024 Measure Set Review (MSR): Final Preliminary Assessment

The following information was sourced in June of 2024 from the Centers for Medicare & Medicaid Services (CMS) Measures Inventory Tool (CMIT), the PQM Submission Tool and Repository (STAR), discussions with CMS program leads, and publicly available CMS datasets (see links below).

I. Measure Information

CMIT ID	Title
00452-01-C-PARTD	MPF Price Accuracy
Measure Steward	CMS Program
Centers for Medicare & Medicaid Services (CMS)	Medicare Part D Star Rating

Measure Overview
<p>Rationale: This measure evaluates the accuracy of drug prices provided by Medicare Part D plans and posted on the Medicare Plan Finder (MPF) tool (at medicare.gov/plan-compare) compared to a drug's total cost at the pharmacy. The measure is used to evaluate the performance of Part D plans (at the contract level). The MPF tool is used by Medicare beneficiaries to assist with the selection of a Medicare Advantage (MA) and/or Part D plan. It is vital that plan sponsors submit accurate pricing data for display on the MPF tool so that beneficiaries can make informed decisions about plan enrollment.</p>
<p>Description: The MPF Price Accuracy measure is a score comparing the drug's total cost at the pharmacy (reflected in Prescription Drug Event [PDE] data) to the drug prices the plan provided for the MPF website. Higher scores indicate better performance by plans because they mean the plans provided more accurate prices.</p> <p>The measure is a composite score that factors in both how much (magnitude of difference) and how often (frequency of difference) PDE prices exceeded the prices reflected on the MPF tool. A plan's MPF Price Accuracy Score is the average of the Accuracy Index (the "Price Accuracy Score"), which measures the amount that the PDE price is higher than the MPF price, and the Claim Percentage Index (the "Claim Percentage Score"), which measures how often the PDE price is higher than the MPF price. The Price Accuracy Score and the Claim Percentage Score consider both ingredient cost and dispensing fee when comparing MPF and PDE prices. Prices only count against the plan's score if the PDE price is higher than the MPF price; instances where the PDE price is lower than the MPF price do not count against the plan's score.</p> <p>The measurement period is January to September in the calendar year.</p>
<p>Numerator:</p> <p>As stated in the description, the MPF Price Accuracy measure is a composite score comprised of both a Price Accuracy Score and a Claim Percentage Score.</p> <p><i>Price Accuracy Score:</i></p> <p>The Price Accuracy Score is based on the Accuracy Index, which is computed as the sum of the (Total amount that PDEs are higher than MPF prices + Total PDE cost) / (Total PDE cost).</p>

Therefore, the numerator is the sum of the (Total amount that PDEs are higher than MPF prices + Total PDE cost). The denominator is the total PDE cost for the contract. The best possible accuracy index is 1. An index of 1 indicates that a plan did not have PDE prices greater than MPF prices. A contract's Price Accuracy Score is computed using its Accuracy Index as: $(100 - ((\text{Accuracy Index} - 1) \times 100))$. The best possible Price Accuracy Score is 100.

Claim Percentage Score:

The Claim Percentage Score is based on the Claim Percentage Index, which is computed as: $(\text{Total number of PDEs where PDE cost is higher than MPF}) / (\text{Total number of PDEs})$.

Therefore, the numerator is the total number of PDEs where PDE cost is higher than MPF. The denominator is the total number of PDEs for the contract. The best possible claim percentage index is 0. An index of 0 indicates that a plan did not have PDE prices greater than MPF prices. A contract's Claim Percentage Score is computed using its Claim Percentage Index as: $((1 - \text{Claim Percentage Index}) \times 100)$. The best possible Claim Percentage Score is 100.

MPF Composite Price Accuracy Score:

A contract's MPF Composite Price Accuracy Score is calculated as: $(0.5 \times \text{Price Accuracy Score}) + (0.5 \times \text{Claim Percentage Score})$. The best possible MPF Composite Price Accuracy Score is 100.

Exclusions:

The measure relies in part on the submission of pricing data to MPF. Therefore, only contracts with at least one plan meeting all of the following criteria are included in the analysis:

- Not a PACE plan
- Not a demonstration plan
- Not an employer plan
- Part D plan
- Plan not terminated during the contract year

A contract with less than 30 PDE claims over the measurement period will not have a score calculated. PDEs must also meet the following criteria:

- If the National Provider Identifier (NPI) in the Pharmacy Cost (PC) file represents a retail-only pharmacy or retail and limited access drug-only pharmacy, all corresponding PDEs will be eligible for the measure. However, if the NPI in the PC file represents a retail and other pharmacy type (such as mail, home infusion, or long-term care pharmacy), only the PDE where the pharmacy service type is identified as either community/retail or managed care organization (MCO) will be eligible.
- Drug must appear in formulary file and in MPF pricing file.
- PDE must be a 28-34-, 60-62-, or 90-93-day supply. If a plan's bid indicates a 1-, 2-, or 3-month retail days' supply amount outside of the 28-34, 60-62, or 90-93 windows, then additional days' supply values may be included in the accuracy measure for the plan.
- Date of service must occur at a time that data are not suppressed for the plan on MPF.
- PDE must not be a compound claim.
- PDE must not be a non-covered drug.
- The PDE must occur in Quarter 1 through 3 of the year. Quarter 4 PDEs are not included because MPF prices are not updated during this last quarter.

Denominator: See numerator.

Exclusions: See numerator.

Measure type: Process	Measure is a composite: Yes Measure is digital and/or an eCQM: Yes
Level(s) of analysis/measured entity: Medicare Part D plans (at the contact level). Medicare Advantage Prescription Drug Plans (MA-PDs) and standalone Prescription Drug Plans (PDPs) are measured separately.	Care setting: No applicable care settings
Risk adjustment and/or stratification: No. Process measures are not often risk adjusted.	Data source(s): Administrative Data (non-claims), Claims Data
Data collection method: Administrative & claims data	Reporting frequency: Annual
All required data are collected as part of clinical workflow: Yes	Reporting overlap with similar/related measures: No
Does this measure fill a statutorily required category for the program? No	Is this measure included in upcoming rulemaking? No

Measure Status	
Current CBE Endorsement Status: Not Endorsed	CBE Endorsement History: None

II. Measure Performance

00452-01-C-PARTD Performance in Star Part D 2020-2022

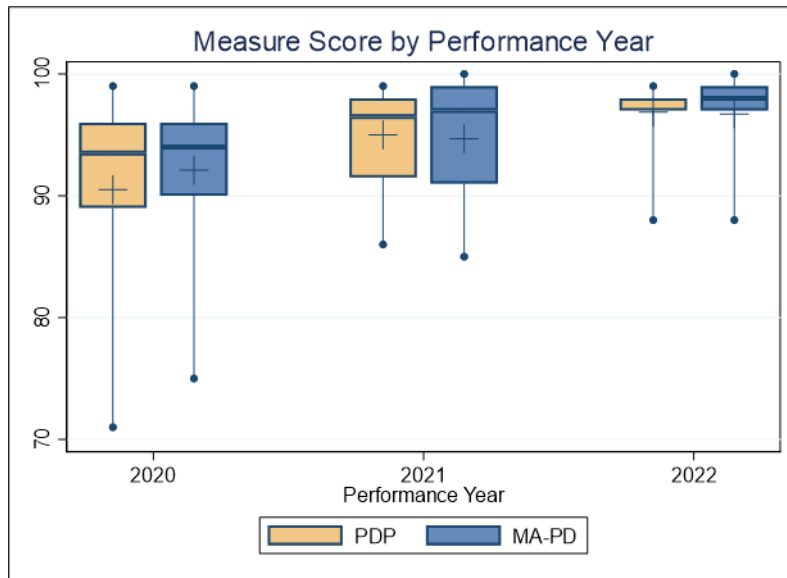
For this measure, the MSR evaluation and analysis team reviewed the following publicly available datasets at [Part C and D Performance Data | CMS](#).

This measure evaluates Part D plans’ performance; that is, the entities evaluated by this measure are individual Part D contracts (plan sponsors). Figure 1 is a boxplot that shows the distribution of the performance of the composite MPF Price Accuracy measure over the past 3 years (where available) for PDPs and MA-PDs. For each performance year (the performance period is January-September for each year), the dots indicate the lower 5th and upper 95th percentiles, and the vertical line is the range between these values (90% of the measure scores are between the dots). The box spans the lower 25th to the upper 75th percentile (50% of the measure scores are within the box). The horizontal line in the box indicates the median score, and the “+” indicates the average score. This plot can be used to assess overall trends in the score over time.

Interpretation: In the plot below, the median score for both PDPs and MA-PDs increased from about 94 for the 2020 measurement period (2022 Star Ratings) to about 97 in 2021 (2023 Star Ratings) and to about 97.5 in 2022 (2024 Star Ratings). The score seems to have a significant increasing trend over the past 3 years. Additional context provided by the program lead suggests this change may be driven by a change in measure methodology to increase the

threshold for flagging PDEs as discrepant from 1 cent up to 2 cents. This change took effect in performance year 2022 (2024 Star Ratings).

Figure 1. Boxplot of Measure Score by Year¹



Importance Tables²

Interpretation of measure scores: These tables show the relative spread of the scores and how many enrolled beneficiaries are impacted for the 2022 measurement period. The composite MPF Price Accuracy measure data is summarized in Table 1 for PDPs and in Table 2 for MA-PDs. The Claim Percentage Score portion of the measure score is summarized in Table 3 for PDPs and in Table 4 for MA-PDs. The overall measure score for PDPs ranges between 86 and 99 (the maximum possible value) in Table 1 and between 62 and 100 for MA-PDs in Table 2.

Often, the lowest or highest deciles (which, by definition, each represent about 10% of the entities) may represent a disproportionately higher or lower percentage of enrolled beneficiaries. For PDPs, Decile 1 in Table 1, which happens to contain 13% of the entities (contracts) represents nearly 37% of the enrolled beneficiaries and 40% of the Part D PDE claims. For MA-PDs, Decile 1 in Table 2 represents about 20% of the enrolled beneficiaries and 20% of the Part D PDE claims, suggesting that MA-PDs with low scores also tend to have high claim and enrollment volume. However, because the majority of the scores are above 98 in both Table 1 and Table 2, low claim and enrollment volume is not necessarily associated with high scores.

Tables 3 and 4 are importance tables for the Claim Percentage Score portion composite score. These tables can also be used to evaluate the impact of improving the Claim Percentage Score. For example, for PDPs in Table 3, at least 20% of the entities perform better than the 8th Decile (97.2%), which could be considered the benchmark. The number of “accurate claims” for each

¹ Performance period is January-September.

² Elements of these tables were provided by the CMS program lead and measure developer based on prior measure performance and internal analyses.

decile can be estimated by multiplying the total claims by the corresponding rate. Here the estimated total number of accurate claims across all deciles is about 225 million. If Deciles 1-7 performed at the benchmark of 97.2%, there would be an estimated 8.5% more accurate claims (about 245 million). For MA-PDs in Table 4, at least 20% of the entities perform better than the 8th Decile (97.7%), which could be considered the benchmark. The estimated total number of accurate claims across all deciles is about 270 million. If Deciles 1-7 performed at the benchmark of 97.7%, there would be an estimated 6% more accurate claims (about 285 million).

Table 1. Importance (Decile by performance score, 2022) – PDPs

Results	Mean Score (SD)	Entities	Enrollment	Claims
Overall	96.87 (3.31)	31	20,815,208	250,750,376
Minimum	86	1	3,331,272	42,609,104
Decile 1	89.3	4	7,675,336	100,433,107
Decile 2	96.7	3	165,960	2,097,317
Decile 3	97	3	6,178,479	62,379,399
Decile 4	98	3	75,094	1,123,083
Decile 5	98	3	684,355	7,341,715
Decile 6	98	3	1,639,742	18,600,154
Decile 7	98	3	203,101	2,739,363
Decile 8	98.3	3	1,665,893	18,759,607
Decile 9	99	3	705,720	9,371,695
Decile 10	99	3	1,821,528	27,904,936
Maximum	99	7	4,158,733	55,554,060

Table 2. Importance (Decile by performance score, 2022) – MA-PDs

Results	Mean Score (SD)	Entities	Enrollment	Claims
Overall	96.71 (3.85)	649	28,291,188	291,213,230
Minimum	62	1	233	775
Decile 1	87.3	65	5,488,580	57,606,949
Decile 2	94.4	65	1,032,567	16,435,312
Decile 3	96.8	65	1,258,738	20,708,726
Decile 4	97.2	65	1,745,930	27,155,454
Decile 5	98	65	3,578,118	29,871,088
Decile 6	98	65	2,063,675	23,010,379
Decile 7	98	65	5,580,439	44,259,274
Decile 8	98.9	65	3,032,899	38,449,989
Decile 9	99	65	1,565,870	14,476,574
Decile 10	99.6	64	2,944,372	19,239,485
Maximum	100	40	2,127,383	9,373,622

Table 3. Importance (Decile by Claim Percentage Score only, 2022) – PDPs

Results	Mean Score (SD)	Entities	Enrollment	Claims
Overall	94.0 (6.40)	31	20,815,208	250,750,376
Minimum	74.1	1	3,331,272	42,609,104
Decile 1	79.7	4	7,675,336	100,433,107
Decile 2	93.9	3	165,960	2,097,317
Decile 3	95.3	3	6,178,479	62,379,399
Decile 4	95.8	3	75,094	1,123,083
Decile 5	95.9	3	684,355	7,341,715
Decile 6	96.2	3	1,639,742	18,600,154
Decile 7	96.4	3	203,101	2,739,363
Decile 8	97.2	3	1,665,893	18,759,607
Decile 9	98.3	3	705,720	9,371,695
Decile 10	99.0	3	1,821,528	27,904,936
Maximum	99.1	1	106,196	1,543,870

Table 4. Importance (Decile by Claim Percentage Score only, 2022) – MA-PDs

Results	Mean Score (SD)	Entities	Enrollment	Claims
Overall	94.0 (7.40)	649	28,291,188	291,213,230
Minimum	27.9	1	283	448
Decile 1	75.8	65	5,469,164	57,434,416
Decile 2	89.8	65	1,057,687	16,728,249
Decile 3	94.2	65	1,205,107	20,327,079
Decile 4	95.3	65	1,769,126	27,649,854
Decile 5	96.0	65	3,623,120	30,002,623
Decile 6	96.6	65	2,112,941	25,124,943
Decile 7	97.3	65	5,939,160	45,651,715
Decile 8	97.7	65	2,552,739	34,077,134
Decile 9	98.5	65	1,590,156	14,776,191
Decile 10	99.4	64	2,971,988	19,441,026
Maximum	100	9	4,522	919

Reliability Tables³

Tables 5-8 are used to summarize reliability of the Claim Percentage Score for PDPs and MA-PDs. It would be difficult to calculate the reliability of the composite measure score because it is a combination of an Accuracy Score and the Claim Percentage Score. Instead, reliability was calculated only for the Claim Percentage Score portion of the score.

Reliability was calculated using Adams signal-to-noise method for the claim percentage portion of the score. The reliability of this portion is very high, mostly because of the large sample sizes; each score is calculated from all eligible PDE claims included in the measure for the contract.

For Tables 5 and 6, entities are sorted by claim volume, and the average reliability is reported along with the number of entities and average number and total enrolled beneficiaries for each decile. This table can be used to assess the impact of population size on the reliability of an entity's measure score. In cases where reliability has a strong relationship to population size, reliability will be the lowest at Decile 1 and progressively increase up to Decile 10.

For Tables 7 and 8, entities are sorted by reliability, and the average reliability by decile is reported. Average, standard deviation, minimum and maximum reliability, and inter-quartile range (IQR) are also included. This table can be used to see the distribution of the reliability of the entities. A measure score is generally considered reliable when the reliability for at least 70% of the individual entities is above 0.6.

³ Elements of these tables were provided by the CMS program lead and measure developer based on prior measure performance and internal analyses.

Interpretation: In the reliability tables below, for both PDPs and MA-PDs, this measure had high reliability across the measured entities during the performance years examined. The reliability is greater than 60% for all PDP contracts and 99.8% of the MA-PD contracts. This is a good indication that the measure score also has high reliability to differentiate between entities.

Table 5. Reliability (Decile by number of claims – Claim Percentage Score only, 2022) – PDPs

Results	Mean Number of Claims	Mean Reliability	Contracts	Total Claims
Overall	8,088,722	99.99	31	250,750,376
Minimum	38,335	99.92	1	38,335
Decile 1	62,605	99.94	4	250,420
Decile 2	214,920	99.99	3	644,760
Decile 3	361,186	100	3	1,083,558
Decile 4	517,138	100	3	1,551,414
Decile 5	643,058	100	3	1,929,173
Decile 6	1,403,339	100	3	4,210,016
Decile 7	2,197,251	100	3	6,591,753
Decile 8	5,404,385	100	3	16,213,155
Decile 9	19,211,695	100	3	57,635,085
Decile 10	53,547,014	100	3	160,641,042
Maximum	61,873,920	100	1	61,873,920

Table 6. Reliability (Decile by number of claims – Claim Percentage Score only, 2022) – MA-PDs

Results	Mean Number of Claims	Mean Reliability	Contracts	Total Claims
Overall	448,711	99.48	31	291,213,230
Minimum	38	100	1	38
Decile 1	573	95.35	4	37,270
Decile 2	6,949	99.68	3	451,678
Decile 3	17,907	99.91	3	1,163,969
Decile 4	37,392	99.96	3	2,430,476
Decile 5	76,784	99.97	3	4,990,988
Decile 6	145,818	99.99	3	9,478,188
Decile 7	237,443	99.99	3	15,433,817
Decile 8	403,026	100	3	26,196,669
Decile 9	818,549	100	3	53,205,698
Decile 10	2,778,507	100	3	177,824,477
Maximum	13,594,573	100	1	13,594,573

Table 7. Mean reliability (By reliability decile – Claim Percentage Score only) – PDPs

Mean	SD	Min	Decile 1	Decile 2	Decile 3	Decile 4	Decile 5	Decile 6	Decile 7	Decile 8	Decile 9	Decile 10	Max	IQR
99.99	2.4	99.89	99.94	99.99	100	100	100	100	100	100	100	100	100	0

Table 8. Mean reliability (By reliability decile – Claim Percentage Score only) – MA-PDs

Mean	SD	Min	Decile 1	Decile 2	Decile 3	Decile 4	Decile 5	Decile 6	Decile 7	Decile 8	Decile 9	Decile 10	Max	IQR
99.48	2.6	57.68	95.14	99.83	99.94	99.97	99.98	99.99	100	100	100	100	100	0.06