

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850



CENTER FOR DRUG and HEALTH PLAN CHOICE

TO: All Part C and D Sponsors

FROM: Cynthia G. Tudor, Ph.D., Director, Medicare Drug Benefit and C & D Data Group

SUBJECT: Offshore Subcontractor Data Module in HPMS

DATE: August 26, 2008

The Centers for Medicare & Medicaid Services (CMS) is pleased to announce the launch of the Offshore Subcontract Data module in the Health Plan Management System (HPMS). To reach the module, follow the path: HPMS > Contract Management Start Page > General Information > Offshore Subcontractor Data.

Sponsors that work with offshore subcontractors (first tier, downstream and related entities) to perform Medicare-related work that uses beneficiary protected health information (PHI) are requested to provide CMS with specific offshore subcontractor information and complete an attestation regarding protection of beneficiary PHI. For more information on offshore subcontracting, please see HPMS memos dated July 23, 2007 (Sponsor Activities Performed Outside of the United States – Offshore Subcontracting) and September 20, 2007 (Sponsors Activities Performed Outside of the United States – Offshore Subcontracting – Q&A) and the 2009 Solicitation for Applications at 3.18 A. 10 (PDP) and at 3.19 A. 10 (MA-PD).

Sponsors that have already submitted hard copy offshore subcontract attestations for their contracts in response to the July 2007 HPMS memo do not need to enter the same information into the Offshore Subcontract Data module at this time.

Part C and D applicants for CY2009 and existing sponsors who have new arrangements with offshore subcontractors should enter the offshore subcontractor information and complete the attestation no later than Friday, September 26, 2008. For offshore subcontracts that are currently under negotiation for CY2008 and/or CY2009 functions but have not yet been signed, subcontractor information and attestations should be entered into the module within thirty (30) calendar days after the offshore subcontract is signed.

If you have any questions regarding this memo, please contact Linda Gousis at Linda.Gousis@cms.hhs.gov or (410) 786-8616.