CMS Part D Audit Report

Auditing Results (Public Website Version)

Date Report Generated: 9/30/2008

Contract Number: All, Chapter: All, Element: All, Finding: Not Met, Auditor: All

Findings: Not Met
Audit ID: 4401
Contract Number: S5902
Part D Sponsor Name: PRESBYTERIAN INSURANCE COMPANY, INC.

Audit Guide Version: PDP Sponsor Part D Audit Guide Version 2
Auditing Element: DN08
Audit Type: Routine
Audit Location: Desk Review
Date Report Issued: 5/10/2008
Date Report Due: 6/24/2008
Element Accepted Date: 9/22/2008
Element Release Date:
Element Projected Completion Date: 10/23/2008

3 Year Reporting Cycle: 1/1/2006 - 12/31/2008
Estimated Visit Start Date: 2/25/2008
Estimated Visit Start Date: 3/26/2008
Actual Visit Start Date: 2/25/2008
Actual Visit End Date: 3/26/2008
Part D Sponsor Response Received Date: 6/24/2008
Part D Sponsor Response Due Date: 6/24/2008
CAP Release Date:
CAP Accepted Date: 9/23/2008

Requirement:

Required Disenrollment for Loss of Part D Eligibility - The Part D sponsor must disenroll an individual who loses eligibility for Part D as a result of loss of entitlement to Medicare and provide the individual notice of the disenrollment within 10 calendar days of notification via the TRR.

Reference:

42 CFR § 423.44(b)(2)(ii), § 423.44(c), § 423.44(d)(3), PDP Guidance Eligibility, Enrollment and Disenrollment

Deficiencies:

The Part D sponsor does not meet this standard. The universe and sampled cases include enrollees who were disenrolled due to death, which are misclassified. CMS also notes that an incorrect notice was sent to the deceased enrollees. For other sampled cases the sponsor issued incorrect notices by sending notices stating the enrollee lost Part D due to loss of Medicare entitlement on Part A and/or B. The sponsor is required to use Model Notice at Exhibit 14 in the PDP Guidance for Eligibility, Enrollment and Disenrolled but incorrectly used the Model Notice at Exhibit 10a for PDP Notice to Confirm Voluntary Disenrollment Identified through Reply Listing.

Corrective Action Required:

Managers need to discuss with staff the proper notices to use for disenrollments. The Part D sponsor must conduct training of appropriate staff on its policies and procedures and submit documentation to CMS that details the nature of this training, including: the materials used in the training, the individuals conducting the training and the individuals being trained. Beginning June 1, the sponsor needs to conduct an internal audit of disenrollments to see if staff are applying the regulations and CMS policies, and to determine if the proper notice is issued. The audit results need to be submitted to CMS through HPMS. The sponsor must provide a detailed description of how it will ensure these requirements are met.

CMS Part D Audit Report

Auditing Results (Public Website Version)

Date Report Generated: 9/30/2008

Contract Number: All, Chapter: All, Element: All, Finding: Not Met, Auditor: All

Findings: Not Met
Audit ID: 4401
Contract Number: S5902
Part D Sponsor Name: PRESBYTERIAN INSURANCE COMPANY, INC.

Audit Guide Version: PDP Sponsor Part D Audit Guide Version 2
Auditing Element: DN09
Audit Type: Routine
Audit Location: Desk Review
Date Report Issued: 5/10/2008
Date Report Due: 6/24/2008
Element Accepted Date: 9/22/2008
Element Release Date:
Element Projected Completion Date: 10/23/2008

3 Year Reporting Cycle: 1/1/2006 - 12/31/2008
Estimated Visit Start Date: 2/25/2008
Estimated Visit Start Date: 3/26/2008
Actual Visit Start Date: 2/25/2008
Actual Visit End Date: 3/26/2008
Part D Sponsor Response Received Date: 6/24/2008
Part D Sponsor Response Due Date: 6/24/2008
CAP Release Date:
CAP Accepted Date: 9/23/2008

Requirement:

Required Disenrollment for Death of Individual - The Part D sponsor must disenroll an individual upon death of the individual and give the estate notice of the disenrollment within 10 calendar days of notification via the TRR.

Reference:

42 CFR § 423.44(b)(2)(iii), § 423.44(c)(2), § 423.44(d)(4), PDP Guidance Eligibility, Enrollment and Disenrollment

Deficiencies:

The Part D Sponsor does not meet this standard. The disenrollment date in the sponsors system does not match the date in the CMS system. The sponsor did not provide the beneficiaries estate a notice that is CMS-approved and/or did not include an explanation of how to correct the record if the death notification was incorrect.

Corrective Action Required:

The Part D sponsor must implement and conduct training on internal procedures and CMS policies. Submit to CMS documentation that details the nature of this training, including: the materials used in the training, the individuals conducting the training and the individuals being trained. Beginning June 1, the sponsor needs to conduct an internal audit of disenrollments for death of individuals to see if staff are following regulations and CMS policies, i.e. issuing the correct notice to the members estate, confirming disenrollment date is correct in internal system and CMS system, and all other appropriate steps. Submit the monthly audit results to CMS through HPMS. The sponsor must provide a detailed description of how it will ensure ongoing compliance with these requirements.

CMS Part D Audit Report

Auditing Results (Public Website Version)

Date Report Generated: 9/30/2008

Contract Number: All, Chapter: All, Element: All, Finding: Not Met, Auditor: All

Findings: Not Met
Audit ID: 4401
Contract Number: S5902
Part D Sponsor Name: PRESBYTERIAN INSURANCE COMPANY, INC.

Audit Guide Version: PDP Sponsor Part D Audit Guide Version 2
Auditing Element: DN12
Audit Type: Routine
Audit Location: Desk Review
Date Report Issued: 5/10/2008
Date Report Due: 6/24/2008
Element Accepted Date: 9/22/2008
Element Release Date:
Element Projected Completion Date: 10/23/2008

3 Year Reporting Cycle: 1/1/2006 - 12/31/2008
Estimated Visit Start Date: 2/25/2008
Estimated Visit Start Date: 3/26/2008
Actual Visit Start Date: 2/25/2008
Actual Visit End Date: 3/26/2008
Part D Sponsor Response Received Date: 6/24/2008
Part D Sponsor Response Due Date: 6/24/2008
CAP Release Date:
CAP Accepted Date: 9/23/2008

Requirement:

Transmission of Disenrollments to CMS - For all voluntary disenrollment requests that the Part D sponsor does not deny, the Part D sponsor must submit the disenrollment transaction to CMS within 7 calendar days of receipt of a complete disenrollment request from an enrollee.

Reference:

42 CFR §423.36(b)(1), PDP Solicitation, PDP Guidance Eligibility, Enrollment and Disenrollment

Deficiencies:

The Part D sponsor fails to transmit the disenrollment transactions to CMS within seven calendar days of the sponsors receipt of the disenrollment request from the enrollee specified by CMS in Section, 40.4.1 of the PDP - Guidance - Eligibility, Enrollment, and Disenrollment.

Corrective Action Required:

The Part D sponsor must revise, implement, and train on its internal policies to assure it is following the CMS policy for transmitting disenrollments to CMS appropriately. The sponsor must conduct training to appropriate staff and submit documentation to CMS that details the nature of this training, including the materials used in the training, the individuals conducting the training and the individuals being trained. Beginning June 1, the sponsor needs to conduct an internal audit of disenrollment tranmissions to observe if staff are following the policy and procedures in a timely manner. The sponsor needs to submit the results of the monthly audits to CMS through HPMS. The sponsor must provide a detailed description of how it will ensure these requirements are met, including future monitoring.

CMS Part D Audit Report

Auditing Results (Public Website Version)

Date Report Generated: 9/30/2008

Contract Number: All, Chapter: All, Element: All, Finding: Not Met, Auditor: All

Findings: Not Met
Audit ID: 4401
Contract Number: S5902
Part D Sponsor Name: PRESBYTERIAN INSURANCE COMPANY, INC.

Audit Guide Version: PDP Sponsor Part D Audit Guide Version 2
Auditing Element: ER02
Audit Type: Routine
Audit Location: Desk Review
Date Report Issued: 5/10/2008
Date Report Due: 6/24/2008
Element Accepted Date: 9/19/2008
Element Release Date:
Element Projected Completion Date: 10/23/2008

3 Year Reporting Cycle: 1/1/2006 - 12/31/2008
Estimated Visit Start Date: 2/25/2008
Estimated Visit Start Date: 3/26/2008
Actual Visit Start Date: 2/25/2008
Actual Visit End Date: 3/26/2008
Part D Sponsor Response Received Date: 6/24/2008
Part D Sponsor Response Due Date: 6/24/2008
CAP Release Date:
CAP Accepted Date: 9/23/2008

Requirement:

Incomplete Enrollment Requests - If the enrollment request is incomplete, the Part D sponsor must determine and notify the individual within 10 calendar days that additional information or documentation is needed to complete the enrollment request. The Part D sponsor must also document its efforts to obtain the missing information or documentation.

Reference:

PDP Solicitation, PDP Guidance Eligibility, Enrollment and Disenrollment

Deficiencies:

The Part D sponsor does not meet this standard. After determining the request for enrollment is incomplete, the sponsor does not obtain the missing information from the beneficiary within 10 calendar days of the sponsor's receipt of the incomplete enrollment request as described in the PDP Guidance-Eligibility, Enrollment and Disenrollment, Chapter 3.

Corrective Action Required:

The Part D sponsor must conduct training of the CMS policy to appropriate staff and submit documentation to CMS that details the nature of this training, including the materials used in the training, the individuals conducting the training and the individuals being trained. Beginning June 1, the sponsor needs to conduct an internal audit of incomplete enrollments to see if staff is following the policy and attempting to obtain the missing information within 10 calendar days of the receipt of the enrollment request. The sponsor needs to submit the results of the monthly audits to CMS through HPMS. The sponsor must provide a detailed description of how it will ensure these requirements are met, including future monitoring.

CMS Part D Audit Report

Auditing Results (Public Website Version)

Date Report Generated: 9/30/2008

Contract Number: All, Chapter: All, Element: All, Finding: Not Met, Auditor: All

Findings: Not Met
Audit ID: 4401
Contract Number: S5902
Part D Sponsor Name: PRESBYTERIAN INSURANCE COMPANY, INC.

Audit Guide Version: PDP Sponsor Part D Audit Guide Version 2
Auditing Element: ER05
Audit Type: Routine
Audit Location: Desk Review
Date Report Issued: 5/10/2008
Date Report Due: 6/24/2008
Element Accepted Date: 9/19/2008
Element Release Date:
Element Projected Completion Date: 10/23/2008

3 Year Reporting Cycle: 1/1/2006 - 12/31/2008
Estimated Visit Start Date: 2/25/2008
Estimated Visit Start Date: 3/26/2008
Actual Visit Start Date: 2/25/2008
Actual Visit End Date: 3/26/2008
Part D Sponsor Response Received Date: 6/24/2008
Part D Sponsor Response Due Date: 6/24/2008
CAP Release Date:
CAP Accepted Date: 9/23/2008

Requirement:

Cancellations of Enrollment Requests - If a beneficiary verbally requests a cancellation of an enrollment request, the Part D sponsor must document the request and process the cancellation. The Part D sponsor must send a notice to the individual within 10 calendar days of the receipt of the cancellation request that states that the cancellation is being processed. Note: Requests for cancellation must be received by the Sponsor prior to effective date of enrollment.

Reference:

PDP Guidance Eligibility, Enrollment and Disenrollment

Deficiencies:

The Part D sponsor does not meet this standard. The sponsor does not provide cancellation notices to the individual within 10 calendar days of the receipt of the cancellation request as described in PDP Guidance-Eligibility, Enrollment and Disenrollment, Section 50.1.1.

Corrective Action Required:

The Part D sponsor must conduct training of the CMS policy to appropriate staff and submit documentation to CMS that details the nature of this training, including the materials used in the training, the individuals conducting the training and the individuals being trained. Beginning June 1, the sponsor needs to conduct an internal audit of applications and enrollment requests to see if staff is following the policy and providing the cancellation notice to the individual within 10 calendar days of the receipt of the cancellation request. The sponsor needs to submit the results of the monthly audits to CMS through HPMS. The sponsor must provide a detailed description of how it will ensure these requirements are met, including future monitoring.

CMS Part D Audit Report

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Date Report Generated: 9/30/2008

Contract Number: All, Chapter: All, Element: All, Finding: Not Met, Auditor: All

Findings: Not Met
Audit ID: 4401
Contract Number: S5902
Part D Sponsor Name: PRESBYTERIAN INSURANCE COMPANY, INC.

Audit Guide Version: PDP Sponsor Part D Audit Guide Version 2
Auditing Element: ER06
Audit Type: Routine
Audit Location: Desk Review
Date Report Issued: 5/10/2008
Date Report Due: 6/24/2008
Element Accepted Date: 9/19/2008
Element Release Date:
Element Projected Completion Date: 10/23/2008

3 Year Reporting Cycle: 1/1/2006 - 12/31/2008
Estimated Visit Start Date: 2/25/2008
Estimated Visit Start Date: 3/26/2008
Actual Visit Start Date: 2/25/2008
Actual Visit End Date: 3/26/2008
Part D Sponsor Response Received Date: 6/24/2008
Part D Sponsor Response Due Date: 6/24/2008
CAP Release Date:
CAP Accepted Date: 9/23/2008

Requirement:

Enrollment Notice and Evidence of Coverage Requirement (Timeliness) - The Part D sponsor must provide a notice to the individual acknowledging receipt of the completed enrollment request no later than 10 calendar days of its receipt, unless the Part D sponsor combines the acknowledgement and confirmation notice. Once the Part D sponsor receives a TRR from CMS indicating whether the individual¿s enrollment has been accepted or rejected, the Part D sponsor must notify the individual of CMS¿ acceptance or rejection of the enrollment within 10 calendar days of the availability of the of the TRR that provides the earliest notification, or within 7 calendar days of the availability of the TRR if the Part D sponsor chooses to provide the required acknowledgement and confirmation information in a single notice. The Sponsor must distribute an Evidence of Coverage (EOC) to each new plan member no later than when the Sponsor notifies the member of CMS¿ acceptance of the enrollment.

Reference:

42 CFR § 423.32(d), PDP Solicitation, PDP Guidance Eligibility, Enrollment and Disenrollment, Medicare Marketing Guidelines for MAs, MA-PDs, PDPs, and 1876 Cost Plans

Deficiencies:

The Part D sponsor does not meet this standard. The sponsor does not send the EOC to the member on the same date the sponsor sends the Final Acceptance Notice to the member as referenced in 42 CFR 423.32(d) and PDP Guidance-Eligibility, Enrollment and Disenrollment, Chapter 3.

Corrective Action Required:

The Part D sponsor must conduct training of the CMS policy to appropriate staff and submit documentation to CMS that details the nature of this training, including the materials used in the training, the individuals conducting the training and the individuals being trained. Beginning June 1, the sponsor needs to conduct an internal audit of enrollments for members of Employer/Union Groups to see if staff is following the policy by sending the EOC to the member on the same date the sponsor sends the Final Acceptance Notice to the member. The sponsor needs to submit the results of the monthly audits to CMS through HPMS. The sponsor must provide a detailed description of how it will ensure these requirements are met, including future monitoring.

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Contract Number: All, Chapter: All, Element: All, Finding: Not Met, Auditor: All

Findings: Not Met
Audit ID: 4401
Contract Number: S5902
Part D Sponsor Name: PRESBYTERIAN INSURANCE COMPANY, INC.

Audit Guide Version: PDP Sponsor Part D Audit Guide Version 2
Auditing Element: ER08
Audit Type: Routine
Audit Location: Desk Review
Date Report Issued: 5/10/2008
Date Report Due: 6/24/2008
Element Accepted Date: 9/19/2008
Element Release Date:
Element Projected Completion Date: 10/23/2008

3 Year Reporting Cycle: 1/1/2006 - 12/31/2008
Estimated Visit Start Date: 2/25/2008
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CAP Release Date:
CAP Accepted Date: 9/23/2008

Requirement:

Provision of Materials Prior to the Effective Date of Enrollment - Prior to the effective date of enrollment, the Part D sponsor must provide the member with all the necessary information about being a Medicare member of the Part D plan, including the Part D plan rules and the member¿s rights and responsibilities. In cases where the Part D sponsor is unable to provide the materials prior to the effective date, it must provide the individuals all required materials no later than 10 calendar days after receipt of the complete enrollment request.

Reference:

PDP Solicitation, PDP Guidance Eligibility, Enrollment and Disenrollment, Medicare Marketing Guidelines for MAs, MA-PDs, PDPs, and 1876 Cost Plans

Deficiencies:

The Part D sponsor does not meet this standard. The sponsor does not send the new member materials prior to the effective date of enrollment, or within 10 calendar days of the sponsors receipt of the complete enrollment request as referenced in PDP Guidance-Eligibility, Enrollment and Disenrollment, Section 30.4.1.

Corrective Action Required:

The Part D sponsor must conduct training of the CMS policy to appropriate staff and submit documentation to CMS that details the nature of this training, including the materials used in the training, the individuals conducting the training and the individuals being trained. Beginning June 1, the sponsor needs to conduct an internal audit of applications and enrollment requests to see if staff is following the policy by sending the new member materials prior to the effective date of enrollment, or within 10 calendar days of the Part D sponsors receipt of the complete enrollment request. The sponsor needs to submit the results of the monthly audits to CMS through HPMS. The sponsor must provide a detailed description of how it will ensure these requirements are met, including future monitoring.

CMS Part D Audit Report

Auditing Results (Public Website Version)

Date Report Generated: 9/30/2008

Contract Number: All, Chapter: All, Element: All, Finding: Not Met, Auditor: All

Findings: Not Met
Audit ID: 4401
Contract Number: S5902
Part D Sponsor Name: PRESBYTERIAN INSURANCE COMPANY, INC.

Audit Guide Version: PDP Sponsor Part D Audit Guide Version 2
Auditing Element: ER14
Audit Type: Routine
Audit Location: Desk Review
Date Report Issued: 5/10/2008
Date Report Due: 6/24/2008
Element Accepted Date: 9/19/2008
Element Release Date:
Element Projected Completion Date: 10/23/2008

3 Year Reporting Cycle: 1/1/2006 - 12/31/2008
Estimated Visit Start Date: 2/25/2008
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Actual Visit End Date: 3/26/2008
Part D Sponsor Response Received Date: 6/24/2008
Part D Sponsor Response Due Date: 6/24/2008
CAP Release Date:
CAP Accepted Date: 9/23/2008

Requirement:

Transmission of Enrollments to CMS - For all enrollment requests that the Part D sponsor does not deny, the Part D sponsor must submit the enrollment transaction to CMS within 7 calendar days of receipt of the complete enrollment request.

Reference:

PDP Solicitation, PDP Guidance Eligibility, Enrollment and Disenrollment

Deficiencies:

The Part D sponsor does not meet this standard. The sponsor does not transmit the enrollment transaction to CMS within seven calendar days of the Part D sponsors receipt of the complete enrollment request as referenced in the PDP Solicitation and the PDP Guidance for Eligibility, Enrollment and Disenrollment, Chapter 3-Section 30.3.

Corrective Action Required:

The Part D sponsor must conduct training of the CMS policy to appropriate staff and submit documentation to CMS that details the nature of this training, including the materials used in the training, the individuals conducting the training and the individuals being trained. Beginning June 1, the sponsor needs to conduct an internal audit of applications and enrollment requests to see if staff are following the policy by transmitting the enrollment transaction to CMS within seven calendar days of the sponsors receipt of the complete enrollment request. The sponsor needs to submit the results of the monthly audits to CMS through HPMS. The sponsor must provide a detailed description of how it will ensure these requirements are met, including future monitoring.

CMS Part D Audit Report

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Date Report Generated: 9/30/2008

Contract Number: All, Chapter: All, Element: All, Finding: Not Met, Auditor: All

Findings: Not Met
Audit ID: 4401
Contract Number: S5902
Part D Sponsor Name: PRESBYTERIAN INSURANCE COMPANY, INC.

Audit Guide Version: PDP Sponsor Part D Audit Guide Version 2
Auditing Element: PP01
Audit Type: Routine
Audit Location: Desk Review
Date Report Issued: 5/10/2008
Date Report Due: 6/24/2008
Element Accepted Date: 9/22/2008
Element Release Date:
Element Projected Completion Date: 10/23/2008

3 Year Reporting Cycle: 1/1/2006 - 12/31/2008
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Part D Sponsor Response Due Date: 6/24/2008
CAP Release Date:
CAP Accepted Date: 9/23/2008

Requirement:

Written Policies and Procedures - The Part D sponsor must adhere to CMS guidance for adopting and maintaining current, written policies and procedures that address all applicable Part D statutes, regulations, and program requirements. These policies and procedures must articulate the specific procedures personnel should follow when performing their duties.

Reference:

42 CFR § 423.504(b)(4)(vi)(A)

Deficiencies:

Sponsors Policies and Procedures do not include the following provisions: ER01- 1) prohibiting use of any question regarding health screening information on enrollments, 2) accepting phone enrollment requests only via in-bound phone calls, 3) requiring phone enrollment be recorded and include in each: A) statement of individuals agreement to be recorded, B) required elements necessary to complete enrollment as listed in App 2 of Enrollment Guidance, C) verbal attestation of intent to enroll, 4) prohibiting each of the following activities: A) request for or collection of credit card numbers or bank account information for any purpose during an enrollment call, B) outbound phone enrollment, C) transfer of outbound calls to inbound lines for enrollment, D) marketing of other lines of business during enrollment call. ER06-distributing an Evidence of Coverage (EOC) to new plan member no later than when sponsor notifies member of CMS confirmation of enrollment. ER08- providing member with necessary information about being a Medicare member of PDP, PDP rules and members rights and responsibilities prior to effective date of enrollment, or within 10 calendar days of receipt of enrollment request if sponsor is unable to provide materials prior to effective date. At a minimum sponsors must provide to the individual: 1) Summary of Benefits (SB), 2) Comprehensive or Abridged Formulary including information on how beneficiary can obtain complete formulary, 3) Pharmacy Directory, 4) Membership ID Card (if Sponsor does not provide member card prior to enrollment effective date, must provide it as soon as possible after effective date), 5) copy of completed enrollment form (if paper and individual does not already have copy), 6) proof of health insurance coverage. This is not the same as EOC. Evidence may be in form of member cards, enrollment form, and/or a notice to member. ER09- distributing plan materials to auto and facilitated enrolled beneficiaries prior to enrollment effective date: 1) proof of health insurance coverage (not EOC), 2) charges for which prospective member will be liable, e.g., any premiums, coinsurance), 3) if sponsor has not yet provided ID card, effective date of coverage and how to obtain services prior to receipt of a member ID card, 4) SB. ER13- 1) contacting beneficiary to confirm his intent to enroll within 10 calendar days of receipt of conditional rejection on TRR, 2) documenting and retaining a record of beneficiary confirmation, whether written or verbal, with record of individuals enrollment request, 3) resubmitting enrollment transaction to CMS with appropriate flag upon receipt of beneficiarys confirmation of his intent to enroll and for denying enrollment and sending a denial notice to beneficiary if he does not respond within 30 calendar days from date he is contacted, or indicates he does not wish to enroll. DN12- for submitting each voluntary disenrollment transaction to CMS within seven calendar days of receipt of the disenrollment request. MR09- ensuring that affected enrollees are provided with a 60 day supply of the Part D drug under the same terms as previously allowed at the time a refill is requested, and are provided written notice of the formulary change, when no prior notice is given. PR02- prohibiting the use of an enrollees SSN or HICN on member ID cards. After the exit conference the sponsor submitted a draft policy which includes this provision. FM03- describing the procedures for providing a notice of formulary maintenance changes, a notice of other formulary changes and retrospective notice to CMS, SPAPs, and entities providing other Rx drug coverage if a covered Part D drug is immediately removed from the formulary when the FDA deems it unsafe or the manufacturer removes it from the market.

Corrective Action Required:

For each of the elements listed in the deficiency section, the Part D sponsor must revise its policies and procedures to include the provisions listed. When revised and approved by appropriate staff, submit a copy to CMS. CMS guidance for the required provisions can be found at: ER01 - 42 CFR 423.32(b), PDP Guidance Eligibility, Enrollment and Disenrollment (PDP-EED)-Chapter 3-Section 30.1.3. ER06 - 42 CFR 423.32(d), PDP Solicitation-Section 3.5, PDP-EED-Chapter 3-Section 30.4.1, Medicare Marketing Guidelines (MMG)-Section 7. ER08 - PDP Solicitation-Section 3.5, PDP-EED-Chapter 3-Section 30.4.1, MMG, Section 7. ER09 - 42 CFR 423.34(d), PDP Solicitation-Section 3.5, PDP-EED-Chapter 3-Section 30.1.4. ER13 - PDP-EED-Chapter 3-Sections 20.3.8, 20.4, and 20.5. DN12 - 42 CFR 423.36(b)(1), PDP-EED-Chapter 3-Section 40.4.1. MR09 - MMG-Section 6. PR02 - PDP and MA-PD Solicitations. FM03 - MMG-Section 6, Prescription Drug Benefit Manual -Chapter 6-Section 30.3. The sponsor must conduct training on the revised policies and procedures to appropriate staff and submit documentation to CMS that details the nature of this training, including the materials used in the training, the individuals conducting the training and the individuals being trained.