

How to Prepare for 2019 CMS Rule Change to Marketing Materials: ANOCs, EOCs, Summary of Benefits?–?Issues, Impact, Disclosures, and Audits

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January 29, 2020

- CMS Expectations: Plans must verify that accurate and complete data is represented on materials; identify benefit changes year-to-year; reduce/eliminate erratas
- Regulatory Changes: Allowing for e-materials means that plans need to be diligent on data presented to members; CMS’s distinguishing between e-communication and e-marketing materials may lead to more focus and scrutiny on these required materials
- Audits and Best Practices: Audit issues; disclosed issues to CMS tied to CPE audit and pre-audit issue summary; beneficiary impact; tracer sample

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