PQS Summary of 2021 Medicare Part C and D Star Ratings Technical Notes

THRESHOLD UPDATE
On October 8th, CMS released the Medicare 2021 Part C & D Star Rating Technical Notes. This update documents the trends and high-level summary of performance associated with key Part C & D measures.

The 2021 Star Ratings for Medicare Part C & D plans are displayed on the Medicare Plan Finder found at [www.medicare.gov](http://www.medicare.gov). Medicare beneficiaries, starting on October 15th, have been able to view these 2021 Star Ratings when selecting their MA-PD or PDP for the 2021 benefit year as part of the Open Enrollment period which will continue through December 7th.

Effective with the November EQuIPP® performance refresh, Pharmacy Quality Solutions (PQS) will display the updated 2021 Star Rating thresholds in EQuIPP® for the 3-, 4-, and 5-Star MAPD Thresholds within the Goal drop down menu on the main page. However, most plans, PBMs, and associated programs will continue to maintain customized programmatic goals which would be detailed in the Quality Improvement Program (QIP) table in addition to any applicable “My Programs” displays.

As partners for improving quality, PQS has provided key highlights from the 2021 Part C & D Star Rating Technical Notes that impact pharmacy-based quality measures. The complete version of the Technical Notes can be found [here](#).

Note: See Appendix I for the 2021 MAPD and PDP thresholds and Appendix II for average performance trends from 2014-2021.

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**General Points and Highlights from the Medicare 2021 Part C & D Star Rating Technical Notes:**

- The 2021 Star Ratings do not contain any new measures, just updates to how measures are weighted and a measure (i.e. All-Cause Readmissions) that was transitioned to a Display measure. The measure was temporarily transitioned to a display measure as the measure specifications had a substantive change.
- Due to CMS’s commitment to putting patients and beneficiaries first, the 2021 Star Ratings incorporate the increased measure weighting of patient experience/complaint and patient access measures from 1.5 to 2. Examples include:
  - Getting needed care
  - Getting appointments and care quickly
  - Customer service
  - Rating of Health Care Quality, Rating of Health/Drug Plan
  - Complaints about the Health/Drug Plan
  - Members choosing to leave the plan, etc.
• Decision on how to modify ratings due to COVID-19 Public Health Emergency:
  o Changes were made to the 2021 Star Ratings for measures in which collecting data was
    disrupted or negatively impacted. In addition to the 2021 Star Ratings, changes are also made
    to account for 2022 Star Ratings that are negatively impacted due to the public health emergency.
  o For the 2021 Star Ratings, CMS informed Health Plan sponsors that HEDIS and CAHPS survey data
    was not required for submission, and that data from the prior year would be carried forward. Data
    for all other measures was updated to account for the 2021 Star Ratings as the data would have
    represented the 2019 calendar year (pre-pandemic).
• The other large weighting change with these ratings includes the change from a single to a triple weight
  for the Statin Use in Persons with Diabetes (SUPD) measure. However, through proposed rulemaking, CMS
  is targeting to transition this measure back to being defined as a process measure and therefore the single
  weight that corresponds with process measures for future years.
• Approximately 77% of MAPD enrollees (4% decrease from 2020) and ONLY 17% of PDP enrollees
  (drop from 28% in 2020) are in a Medicare contract with a rating of 4 or more stars.
• Average Overall MAPD Star Rating decreased to 4.06, which is identical to the average Star Rating in

### Focused Updates for Medication-Related Part D Measures
from the Medicare 2021 Part C & D Stars

### Medication Adherence Measures

#### Key Takeaways
- Performance trends in Star Ratings continue to become more competitive as average scores for each of
  the adherence measures increased from the 2020 Star Ratings, yet each of the PDC measures for MAPD
  saw a decrease in the average Star Rating.

<table>
<thead>
<tr>
<th>2021 MAPD Average Star</th>
<th>2020 MAPD Average Star</th>
</tr>
</thead>
<tbody>
<tr>
<td>PDC Diabetes: 3.7</td>
<td>PDC Diabetes: 3.9</td>
</tr>
<tr>
<td>PDC Hypertension: 3.2</td>
<td>PDC Hypertension: 3.3</td>
</tr>
<tr>
<td>PDC Cholesterol: 3.3</td>
<td>PDC Cholesterol: 3.4</td>
</tr>
</tbody>
</table>

- MAPD average adherence rates for all three adherence measures increased, with Statin PDC having
  the largest average increase of 2% compared to the 2020 Star Rating CMS reported averages.

- The average PDP Star Ratings per measure increased, except for PDC Hypertension which saw a 0.1
  Average Star decrease. The 2021 Measure Star averages compared to the prior year are:

<table>
<thead>
<tr>
<th>2021 PDP Average Star</th>
<th>2020 PDP Average Star</th>
</tr>
</thead>
<tbody>
<tr>
<td>PDC Diabetes: 3.9</td>
<td>PDC Diabetes: 3.3</td>
</tr>
<tr>
<td>PDC Hypertension: 3.1</td>
<td>PDC Hypertension: 3.2</td>
</tr>
<tr>
<td>PDC Cholesterol: 3.6</td>
<td>PDC Cholesterol: 3.3</td>
</tr>
</tbody>
</table>
Medication Adherence Measures Continued

• Despite the drop in the average Star Rating for the PDC hypertension measure, the average score increased by 1%. Additionally, despite both the PDC diabetes and cholesterol measures having a 0.6 and 0.3 Star increase respectively, the numerical average increased by 1% compared to the prior year.
• For the MAPD thresholds, most thresholds have increased, with PDC diabetes having the highest increase of 3% for a threshold of 88% in order to be considered 5 Stars.
• For PDP, PDC measure thresholds remained relatively flat, with PDC diabetes having a decrease of 1% for a threshold of 87% in order to reach 5 Stars.
• The average 2021 PDC scores (based on 2019 data) were:

<table>
<thead>
<tr>
<th>Measure</th>
<th>Diabetes</th>
<th>Hypertension</th>
<th>Cholesterol</th>
</tr>
</thead>
<tbody>
<tr>
<td>MAPD</td>
<td>84% [+1%]</td>
<td>85% [No Change]</td>
<td>84% [+2%]</td>
</tr>
<tr>
<td>PDP</td>
<td>85% [+1%]</td>
<td>87% [+1%]</td>
<td>85% [+1%]</td>
</tr>
</tbody>
</table>

Measure Details
• This measures the percentage of eligible members with a proportion of days covered (PDC) rate at 80% or over for the specific drug classes (e.g. diabetes, hypertension, and cholesterol medications)
• Patients with one or more claims for sacubitril/valsartan are excluded from the hypertension/RASA adherence measure
• As a reminder, starting with the 2020 Star Ratings, End Stage Renal Disease (ESRD) exclusions have been applied to measure results for PDC diabetes and PDC cholesterol. As a result, all three adherence measures continue to have an ESRD exclusion represented in the Star Ratings results.

Statin Use in Persons with Diabetes (SUPD)

Key Takeaways
• The average Star Rating for MAPD plans decreased from 3.5 in 2020 to 3.1 in the 2021 Star Ratings. For PDPs, the average Star Rating remained consistent at 3.0 Stars. This measure represents a significant focus point for the Part D Summary Rating for the 2021 Stars since the average measure-level star rating decreased by almost one-half star, coupled with the weighting change to becoming a triple-weighted measure. As previously mentioned, the weighting of the measure is being proposed in future rulemaking to shift back to a single-weighted measure.
• The average performance score for the measure was up 2% for MAPD to a new average of 82% and up 1% for PDPs to a new average of 80%.

Measure Details
• Measures the percentage of beneficiaries 40-75 years old who were dispensed at least two diabetes medication fills who received a statin medication fill at any point during the measurement period.
• Exclusions include members with ESRD or who are enrolled in hospice.
Statin Therapy for Patients with Cardiovascular Disease (SPC) – PART C

Key Takeaways
• Interestingly, CMS categorizes the SPC measure as a process measure, but SUPD as an intermediate outcome measure. As a result, the SPC measure contains a single weight and is a unique distinction between the two measures, despite a considerable amount of measure overlap as it relates initiating statin therapy.
• The average Star Rating for MAPD plans remained consistent at 3.1 Stars along with a consistent average performance score of 81%.

Measure Details
• Measures the percentage of males 21–75 years of age and females 40–75 years of age during the measurement year, who were identified as having clinical atherosclerotic cardiovascular disease (ASCVD) and were dispensed at least one high or moderate-intensity statin medication during the measurement year.
• Several exclusions exist with other conditions including ESRD.
• Key differences from the Part D SUPD measure involves the focus specifically on ASCVD and the need to consider the intensity of the statin as opposed to SUPD which does not consider statin intensity as part of the measure specifications. For SPC, only moderate to high-intensity statins are to be prescribed for the qualifying patient population.

MTM Program Completion Rate for Comprehensive Medication Review (CMR)

Key Takeaways
• The average Star Rating for MAPD plans increased from 3.6 Stars to 3.7 Stars for 2021. For PDP plans, the average Star rating increased from 3.3 to 3.6 Stars for 2021, bringing the average Star rating for the measure similar across both MAPDs and PDPs. However, the measure averages continue to be significantly different with a difference of over 30% between the two insurance lines.
• In addition to the increase in measure-level Star Ratings, the measure averages also increased with MAPDs now having an average score of 81%, up 4% from the year prior, and PDPs have an average score of 49%, which is an increase of 5%.

Measure Details
• This measures the percentage of MTM eligible members that have received a CMR during the measurement period.
# APPENDIX I: 2021 MAPD & PDP Thresholds

## MAPD - 2021

<table>
<thead>
<tr>
<th>Measure Name</th>
<th>1 Star</th>
<th>2 Star</th>
<th>3 Star</th>
<th>4 Star</th>
<th>5 Star</th>
</tr>
</thead>
<tbody>
<tr>
<td>PDC Diabetes</td>
<td>&lt;76%</td>
<td>76%</td>
<td>80%</td>
<td>84%</td>
<td>88%</td>
</tr>
<tr>
<td>PDC Hypertension</td>
<td>&lt;80%</td>
<td>80%</td>
<td>84%</td>
<td>87%</td>
<td>89%</td>
</tr>
<tr>
<td>PDC Cholesterol</td>
<td>&lt;75%</td>
<td>75%</td>
<td>83%</td>
<td>86%</td>
<td>88%</td>
</tr>
<tr>
<td>CMR Completion Rate</td>
<td>&lt;48%</td>
<td>48%</td>
<td>71%</td>
<td>81%</td>
<td>89%</td>
</tr>
<tr>
<td>Statin Use in Persons with Diabetes</td>
<td>&lt;77%</td>
<td>77%</td>
<td>81%</td>
<td>83%</td>
<td>87%</td>
</tr>
<tr>
<td>Statin Therapy for Patients with Cardiovascular Disease</td>
<td>&lt;75%</td>
<td>75%</td>
<td>79%</td>
<td>83%</td>
<td>87%</td>
</tr>
</tbody>
</table>

## PDP - 2021

<table>
<thead>
<tr>
<th>Measure Name</th>
<th>1 Star</th>
<th>2 Star</th>
<th>3 Star</th>
<th>4 Star</th>
<th>5 Star</th>
</tr>
</thead>
<tbody>
<tr>
<td>PDC Diabetes</td>
<td>&lt;79%</td>
<td>79%</td>
<td>82%</td>
<td>85%</td>
<td>87%</td>
</tr>
<tr>
<td>PDC Hypertension</td>
<td>&lt;84%</td>
<td>84%</td>
<td>86%</td>
<td>88%</td>
<td>90%</td>
</tr>
<tr>
<td>PDC Cholesterol</td>
<td>&lt;78%</td>
<td>78%</td>
<td>81%</td>
<td>86%</td>
<td>88%</td>
</tr>
<tr>
<td>CMR Completion Rate</td>
<td>&lt;24%</td>
<td>24%</td>
<td>34%</td>
<td>50%</td>
<td>61%</td>
</tr>
<tr>
<td>SUPD</td>
<td>&lt;74%</td>
<td>74%</td>
<td>79%</td>
<td>82%</td>
<td>85%</td>
</tr>
</tbody>
</table>
APPENDIX II: 2021 MAPD & PDP Performance Trends

MAPD - Adherence Measure Averages

PDP - Adherence Measure Averages

CMR Completion Rate - Measure Averages