

MEDICARE PART D COVERAGE GAP DISCOUNT PROGRAM TRAINING FOR PART D SPONSORS AND DRUG MANUFACTURERS



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A CELERIAN GROUP COMPANY

Palmetto GBA
Columbia, South Carolina

Third Party Administrator (TPA) for CMS

- Program Overview
- Connectivity
- Reports
- Making Payments
- Confirming Payments
- Disputing Invoices
- Getting Help

PROGRAM OVERVIEW



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Program Overview

- The Affordable Care Act phases in a reduction in beneficiary cost-sharing for non-low income beneficiaries when they purchase drugs in the Coverage Gap Phase of the Medicare Part D benefit through the Coverage Gap Discount Program and coverage for generic drugs in the Coverage Gap



Coverage Gap Discount Flow

- Part D Sponsors advance Gap Discount at the Point of Sale
- Part D Sponsors submit PDEs to CMS recording the Gap Discount amount

- CMS aggregates PDE data and sends to TPA
- TPA sends quarterly invoice reports to manufacturers and Part D sponsors simultaneously

- Manufacturers pay the invoiced amount in full to Part D sponsors within 38 days
- Manufacturers send confirmation of payment to TPA within 5 days

- Part D Sponsors send confirmation of payment receipt to TPA within 5 days
- The TPA sends payment confirmation statistics to CMS
- CMS offsets invoiced and now paid amounts from Part D Sponsors through APPS



Invoice Distribution Schedule

Quarter End Date	Report Distribution Date
March 31	April 30
June 30	August 30
September 30	October 31
December 31	January 31

- A full program calendar can be found by going to the TPA website at TPAdministrator.com and there will be a CGPD Calendar link on the left hand side of the page

SPONSOR CONNECTIVITY



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Third Party Administrator (TPA) for CMS

- Plan Sponsors
 - Sponsor Portal
 - Accessed using a Browser (e.g. Internet Explorer, Firefox, or Chrome)
 - Web based with password authentication. Files are transferred in a flat file format.
 - Summary & Detail Reports, Payment Confirmation submissions, Payee EFT information, Tracking, Dispute Disposition Report
 - Network Data Mover (NDM), a.k.a. Connect:Direct
 - This option is rarely used. Purchase and installation is required by contacting Sterling Commerce.
 - Contact the TPA if interested in using this type of connection.
 - All of the above listed files are available

DRUG MANUFACTURER CONNECTIVITY



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Third Party Administrator (TPA) for CMS

- Drug Manufacturers
 - Manufacturer Portal (Web Based)
 - Summary & Detail Reports, Payment Confirmation submissions, Payee EFT information
 - Mailbox (via Secure FTP)
 - All of the above plus dispute submissions, return, responses and resolutions
 - Third Party Vendor
 - Provides all the above as a service but Manufacturers still need mailbox connectivity as a contingency



Connectivity for Drug Manufacturers - via Secure FTP

- Accomplished by establishing a Secure FTP (SFTP) connection between your company and the TPA, secured via firewall rules and 2 key SSH authentication
- Initial setup consists of 7 steps
 - Configure TPA firewall rules to accept a connection from your IP address
 - Test your connection via a Telnet session
 - Generate a public / private pair of keys for authentication
 - Have the TPA load your public key
 - Load your private key into your SFTP client
 - Configure your SFTP client for the TPA connection
 - Test your SFTP connection to the TPA



Configure TPA Firewall Rules to Accept a Connection From Your IP address

- You will need to determine your external, outbound IP address and provide it to the TPA
 - Tools such as <http://ip-lookup.net> can be helpful
- Although a static IP address is preferred, a small range of dynamic IP addresses is also acceptable
- The TPA will then update their firewall with your address



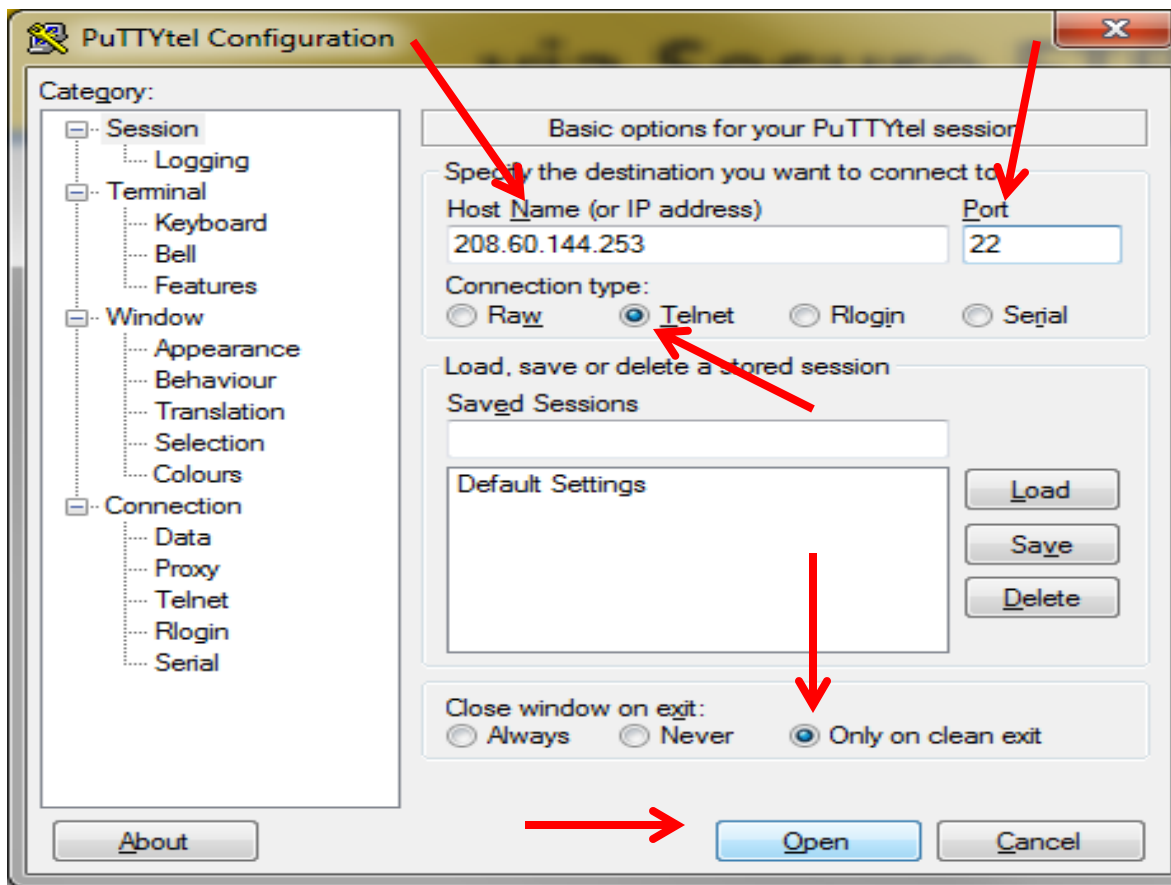
Test Your Connection via a Telnet Session

- Once the IP Address has been loaded by the TPA, you will be notified and asked to perform a Telnet test to verify that the firewall security settings are correct
- The TPA recommends using the Putty Telnet utility to perform this test
 - Go to:
<http://www.chiark.greenend.org.uk/~sgtatham/putty/download.html>
 - Then click on the following:
 - PuTTYtel: puttytel.exe



Test Your Connection via a Telnet Session

- Enter the following information





Test Your Connection via a Telnet Session

- Successful Telnet test should generate the following

```
208.60.144.253 - PuTTYtel
SSH-2.0-VShell_3_8_2_229 VShell
█
```



Generate a Public / Private Pair of Keys for Authentication

- **2 Key SSH Authentication (No need for Username & Password)**
 - SSH Key authentication is an alternative means of identifying yourself to a login server, instead of typing a password. It is more secure and more flexible.
 - With conventional password authentication, you prove you are who you claim to be by proving that you know the correct password. The only way to prove you know the password is to tell the server what you think the password is. This means that if the server has been hacked, or spoofed, an attacker can learn your password.
 - Public key authentication solves this problem. You generate a key pair, consisting of a public key (provided to the TPA) and a private key. The private key is transferable among End Users who require access. The private key cannot be forged by anybody who does not have that key.



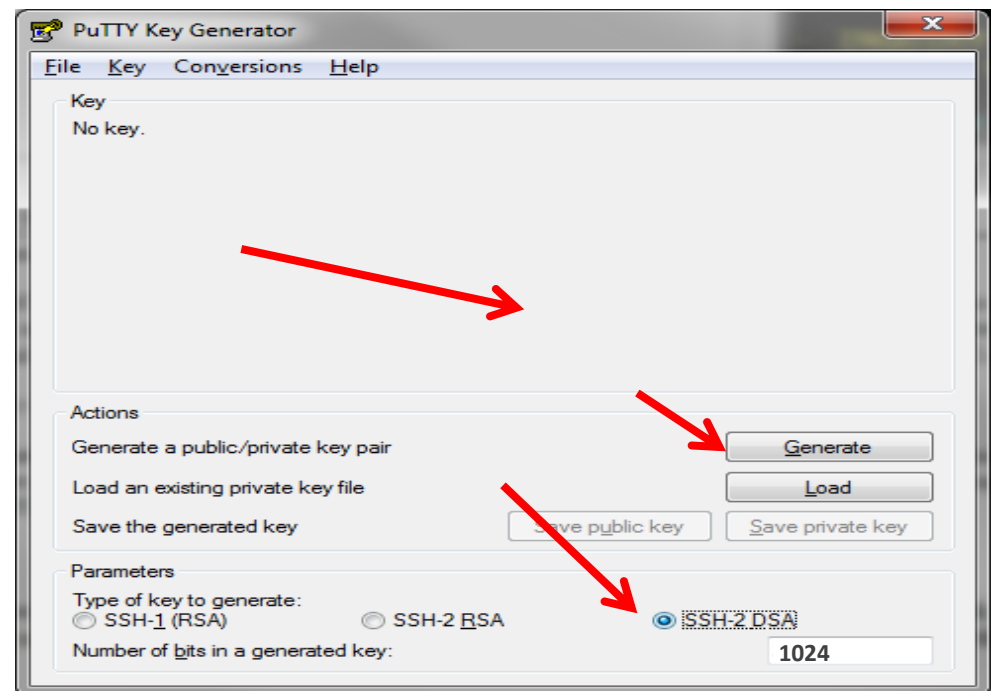
Generate a Public / Private Pair of Keys for Authentication

- The TPA recommends using the Putty Key Generation utility to create your keys
 - Go to:
<http://www.chiark.greenend.org.uk/~sgtatham/putty/download.html>
 - Then click on the following:
 - PuTTYgen: puttygen.exe



Generate Keys & Have TPA Load Your Public Key

- Click the “SSH-2 DSA” radio button
- Click “Generate”
- Move cursor around in the blank grey area to move the process faster
- Save public key as .pub and private key as .ppk
- Provide the public key to the TPA
- Once the public key has been loaded, you are ready to connect your SFTP client





A Note About Choosing an SFTP Client

- The TPA cannot promote or support a particular Secure File Transfer Protocol client software
- There are several free SFTP clients that exist and should work fine as long as they support 1024 bit SSH2 – DSA keys
- The following slides show how to connect using FileZilla



Load Your Private Key Into Your SFTP Client – Using FileZilla

- Install the private key
 - Edit > Settings
 - Connection > FTP > SFTP
 - Click “Add keyfile...”
 - Map to the private key created using PuttyGen and click “OK”
- Configure the TPA connection
 - File > Site Manager...
 - Double click on “New Site”
 - General tab should have our host 208.60.144.253, port 22, SSH File Transfer Protocol
 - Logon Type is set as normal
 - User is XP####PROD (# denotes the 4 digit CMS assigned P number)



Configure & Test Your SFTP Client for the TPA Connection – Using FileZilla

- Configure the TPA connection (continued)
 - Under the Transfer Settings tab, transfer mode is set to passive
 - Limited number of simultaneous connections is set to 1
 - You can now click the “Connect” button at the bottom
 - You should see an Inbound and Outbound directory



Sample FileZilla Connection

filezilla@127.0.0.1 - FileZilla

Host: 127.0.0.1 Username: filezilla Password: ***** Port: Quickconnect

15:51:12 Response: 226 Transfer OK
15:51:12 Status: File transfer successful
15:51:12 Status: Starting upload of C:\dev\svn\FileZilla3\autom4te.cache\output.2
15:51:12 Command: PORT 127,0,0,1,81,119
15:51:12 Response: 200 Port command successful
15:51:12 Command: STOR output.2
15:51:12 Response: 150 Opening data channel for file transfer.

Local site: C:\dev\svn\FileZilla3\src\inter\face\resources\16x16\

Remote site: /16x16

Filename	Filesize	Filetype
auto.png	577 B	Portable Netwc
binary.png	519 B	Portable Netwc
bookmark.png	296 B	Portable Netwc
cancel.png	155 B	Portable Netwc
compare.png	124 B	Portable Netwc
disconnect.png	238 B	Portable Netwc
download.png	143 B	Portable Netwc
downloadadd.png	174 B	Portable Netwc
file.png	258 B	Portable Netwc
filezilla.png	477 B	Portable Netwc

30 files and 1 directory. Total size: 19,5 KiB

Filename	Filesize	Filetype	Last mod
auto.png	577 B	Portable Ne...	2009-03
bookmark.png	296 B	Portable Ne...	2009-03
cancel.png	155 B	Portable Ne...	2009-03
compare.png	117 B	Portable Ne...	2009-03
compare.png~	124 B	PNG~ File	2009-03
disconnect.png	238 B	Portable Ne...	2009-03
downloadadd.png	174 B	Portable Ne...	2009-03
file.png	258 B	Portable Ne...	2009-03
filezilla.png	477 B	Portable Ne...	2009-03

Selected 1 file. Total size: 174 B

Server/Local file

Server/Local file	Direction	Remote file
filezilla@127.0.0.1		
C:\dev\svn\FileZilla3\src\bin\FileZilla_unicode_dbg.exe	-->	/FileZilla_unicode_dbg.exe
00:00:13 elapsed 00:00:19 left		3,473,408 bytes (267.1 KB/s)
C:\dev\svn\FileZilla3\autom4te.cache\output.2	-->	/FileZilla3/autom4te.cache/outp...
00:00:01 elapsed 00:00:01 left		633,8 KiB Normal Transferring
C:\dev\svn\FileZilla3\autom4te.cache\requests	-->	/FileZilla3/autom4te.cache/requ...
		24,0 KiB Normal

Queued files (3566) Failed transfers Successful transfers

Queue: 558 MiB

REPORTS



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Summary / Invoice Report

- Distributed quarterly to Drug Manufacturers and Sponsors
- Positive amounts summarize the payment Sponsors should expect to receive from each Drug Manufacturer
- Negative amounts summarize the payment Drug Manufacturers should expect to receive from each Sponsors due to adjusted or deleted PDEs during the previous quarters
- Also used to create a Payment Confirmation Report that is sent back to the TPA when not using the Manufacturer Portal



Detail / Data Report

- Distributed quarterly to Drug Manufacturers and Sponsors
- Provides Sponsors and Drug Manufacturers an opportunity to review inputs to the invoice
- Incorporates changes in subsequent quarters due to adjustments or deletions of PDEs
- For Drug Manufacturers, this report is also used to create a Dispute file which is sent back to the TPA



Tracking Report

- Distributed quarterly to Sponsors
- Cumulative year report that shows the status of each gap discount PDE saved in the CMS database
- There is one Tracking Report for each benefit year
- Status codes report if a PDE was invoiced or pended

MAKING PAYMENTS



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Making Payment

- Only ACH or Wire transfers permitted
- Payee account information is contained in the EFT file provided by the TPA and updated quarterly
- EFT Individual Identification Number (CG number found on the invoice) should be associated with each payment in order to receive credit from payee
- Payments are made on a contractual level
- Separate payments must be made for each invoice line item (combining not allowed)



Making Payment (continued)

- Negative amounts must not be deducted
- Positive amounts indicate money is owed to the Sponsor from the Drug Manufacturer
- Negative amounts indicate money is owed to the Drug manufacturer from the Sponsor
- Payments must be made even if the Drug Manufacturer disputes the invoice
- Must be paid no later than 38 days after invoice distributed
 - See calendar by going to tpadministrator.com and click the CGDP Calendar link

CONFIRMING PAYMENTS



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Confirming Payment

- Must confirm payments made and payments received and on what date
- Convert the Invoice into a Payment Confirmation Report if not using the Web based, Manufacturer's Portal method
- Drug Manufacturers
 - Mailbox (Flat file via Secure FTP)
 - Manufacturer Portal (web based)
 - Third Party Vendor
- Plan sponsors
 - Sponsor Portal (Flat file via web based password authentication)
 - NDM
- Confirmations due within 5 business days after making payment
 - The TPA recommends confirming right after payment



Confirming Payment

- If not using the Web based Manufacturer portal, the invoice must be edited to become a Payment Confirmation Report and serve as the input file
 - A conversion file layout exists on the TPA website TPAdministrator.com
 - File Layouts
 - Side by Side Comparison of Invoice Payment Confirmation



Payment Confirmation for Drug Manufacturers - via Secure FTP

- Login to the your mailbox using your SFTP client and user ID XP####PROD
- No password is used
 - Settings should have already been established to map to the private key stored on the end user's local PC
- After the Invoice has been converted into a Payment Confirmation Report, it's sent off through the Inbound directory of your SFTP client
- A response file will be placed in your Outbound directory within 24 hours, stating if the Payment Confirmation Report was accepted, rejected, or discrepant



Payment Confirmation for Drug Manufacturers - via Manuf. Portal

- A Web based tool for creating, editing and submitting payment confirmations
 - No need to edit flat files and submit via SFTP
- Readable invoice summary
 - Also provides a list of payments to be made, including EFT ID
- Accessible via a new, secure Manufacturer's Portal
- Manufacturers can choose to stay with flat files or switch to this new tool



Logging In

TPA OPERATIONS

Coverage Gap Discount Program TPA Mailbox

USER LOGIN

User ID

Password


[Forgot Password](#)



Menu Choices

TPA OPERATIONS

Welcome 

| Logout 

HOME

CGDP Third Party Administrators Mailbox

[Access Invoices](#)

[Payment Confirmation User Guide](#)

[Download EFT File Spreadsheet Format](#)

[Download EFT File Text Format](#)



Invoice List

Note: Once you receive an "Accepted" confirmation response, any further submissions will be "Rejected". If you need to resubmit your confirmation, please contact the TPA. They will void the "Accepted" confirmation in order to allow for additional transmissions. [Click here](#) for TPA Contact Information.

Invoice List

3 items found, displaying all items.

Results Per Page : 10

Quarter	P Number	File Name	Invoice Date	Confirm Status	Access File
					Raw Data Payment List Confirm Payments Confirmation File Confirmation Resp.
					Raw Data Payment List Confirm Payments Confirmation File Confirmation Resp.
					Raw Data Payment List Confirm Payments Confirmation File Confirmation Resp.



Payment List

TPA OPERATIONS

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Note: Once you receive an "Accepted" confirmation response, any further submissions will be "Rejected". If you need to resubmit your confirmation, please contact the TPA. They will void the "Accepted" confirmation in order to allow for additional transmissions. [Click here](#) for TPA Contact Information.

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Quarter	P Number	File Name	Invoice Date	Confirm Status	Access File
					Raw Data Payment List Confirm Payments Confirmation File Confirmation Resp.
					Raw Data Payment List Confirm Payments Confirmation File Confirmation Resp.
					Raw Data Payment List Confirm Payments Confirmation File Confirmation Resp.

Submitting Cont No

EHL11
EHL22
EHL33
EHL44

Tot Rptd Gap Disc Amt This Per

18.56
14.50
28.50
-1.00

PXXXX

EFT Ind Indent No

CG1301XXXXEHL11
CG1301XXXXEHL22
CG1301XXXXEHL33
CG1301XXXXEHL44

Cur Rptg Per

201301

Manuf P No

PXXXX

Contract Rec Count

0000004

Tot Rptd Gap Disc Prev Amt

0.00

Tot Rptd Gap Disc Curr Amt

61.60

Tot Rptd Gap Disc Amt This Per

60.56



Entering Amounts Paid

TPA OPERATIONS

Welcome

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HOME

[Back to My Invoices](#)

Payment Confirmations for Contract PXXXX

<input type="checkbox"/>	Seq #	Contract	Invoiced Amount	Pmt Amount	Pmt Date	Pmt Method	Status
<input type="checkbox"/>	0000001	EHL11	\$18.56	\$ 18.56	07/22/2013	ACH	
<input type="checkbox"/>	0000002	EHL22	\$14.50	\$ 14.50	07/22/2013	ACH	
<input type="checkbox"/>	0000001	EHL33	\$28.50	\$ 28.50	07/22/2013	ACH	
<input type="checkbox"/>	0000002	EHL44	-\$1.00	\$ 0	07/22/2013	ACH	Changed

[Confirm Selected Lines](#)

[Reset Selected Lines](#)

Set Payment Method (All Lines): [ACH](#) | [Wire](#) | [Other](#)

Set Payment Date (All Lines): [Update](#)

Invoice and Confirmation Totals			
Invoice Total:	\$60.56	Invoiced Lines:	4
Confirmation Total:	\$0.00	Confirmed Lines:	0
Balance Total:	\$60.56	Discrepant Lines :	0

[Reset Invoice / Start Over](#)

[Back To Previous Page](#)

[Transmit Payment Confirmation File](#)

Legend

- Discrepant
- Confirmed
- Error
- Changed



Confirming Payments

TPA OPERATIONS

Welcome

| Logout

HOME

[Back to My Invoices](#)

Payment Confirmations for Contract PXXXX

Payment Confirmations do not balance to Invoice Amount.

<input type="checkbox"/>	Seq #	Contract	Invoiced Amount	Pmt Amount	Pmt Date	Pmt Method	Status
<input type="checkbox"/>	0000001	EHL11	\$18.56	\$ 18.56	07/22/2013	ACH	Confirmed
<input type="checkbox"/>	0000002	EHL22	\$14.50	\$ 14.50	07/22/2013	ACH	Confirmed
<input type="checkbox"/>	0000001	EHL33	\$28.50	\$28.50	07/22/2013	ACH	Confirmed
<input type="checkbox"/>	0000002	EHL44	-\$1.00	\$ 0	07/22/2013	ACH	Discrepant

[Confirm Selected Lines](#) [Reset Selected Lines](#)

Set Payment Method (All Lines): [ACH](#) | [Wire](#) | [Other](#)

Set Payment Date (All Lines): [Update](#)

Invoice and Confirmation Totals			
Invoice Total:	\$60.56	Invoiced Lines:	4
Confirmation Total:	\$61.56	Confirmed Lines:	4
Balance Total:	-\$1.00	Discrepant Lines :	1

[Reset Invoice / Start Over](#) [Back To Previous Page](#) [Transmit Payment Confirmation File](#)

Legend

- Discrepant
- Confirmed
- Error
- Changed



Transmitting Confirmation

[Back to My Invoices](#)

Payment Confirmations for Contract PXXXX Transmission Confirmation

You have invoice and confirmation amounts that do not balance.



To transmit your confirmations, please verify that you are aware of this and want to send the confirmations anyway.

Invoice and Confirmation Totals			
Invoice Total:	\$60.56	Invoiced Lines:	4
Confirmation Total:	 \$61.56	Confirmed Lines:	4

Are you sure you wish to upload this confirmation for processing?


I confirm that I want to transmit this confirmation out of balance.



Transmission Receipt

TPA OPERATIONS

Welcome 

| Logout 

HOME

[Back to My Invoices](#)

Payment Confirmations for Contract PXXXX Transmission Receipt

Successfully transmitted confirmation for Mainframe processing and Response Report should be available by 4:30 PM

Your confirmation has been sent to the processing system with a transmission time of **Tue Jul 23 08:32:55 EDT 2013**


Final Response Review

For your final response review and proof of receipt, please log into your mailbox to confirm that you have received a response from the processing system.



This payment confirmation was transmitted out of balance with the invoice total.

Invoice and Confirmation Totals

Invoice Total:	\$60.56	Invoiced Lines:	4
Confirmation Total:	 \$61.56	Confirmed Lines:	4

[Download Payment Confirmation File](#)


[Return to Invoice List](#)



Status of Confirmations

TPA OPERATIONS

Welcome 


| Logout 

HOME

Invoice List

Displaying 1-10 of 3. [\[First/Prev\]](#) 1, [\[Next/Last\]](#)

Results Per Page : 10

Quarter	P Number	File Name	Invoice Date	Confirm Status	Access File
2013-01	PXXXX	R1022101.RPT.MANUF_INVOICE	2013-07-22	 CONFIRMED_DISCREPANCY	Download Raw Data Download PDF File Confirm Payments Download Confirm File History
2013-01	PXXXX	R1022101.RPT.MANUF_INVOICE	2013-07-22	CONFIRMED	Download Raw Data Download PDF File Confirm Payments Download Confirm File History
2012-01	PXXXX	R1609357.RPT.MANUF_INVOICE	2013-07-22	NEW	Download Raw Data Download PDF File Confirm Payments Download Confirm File History



Payment Confirmation for Plan Sponsors - via Sponsor Portal

- www.csscooperations.com
- Prescription Drug Event
- Coverage Gap Discount Program (CGDP)
- Access CGDP Mailbox

The screenshot shows a web browser window with the address bar displaying https://www4.palmettogba.com/ecx_tpamailbox2/. The page title is "TPA OPERATIONS" and the main heading is "Coverage Gap Discount Program TPA Mailbox". Below the heading is a "USER LOGIN" form with the following fields:

USER LOGIN	
User ID	<input type="text"/>
Password	<input type="password"/>
<input type="button" value="Login"/>	

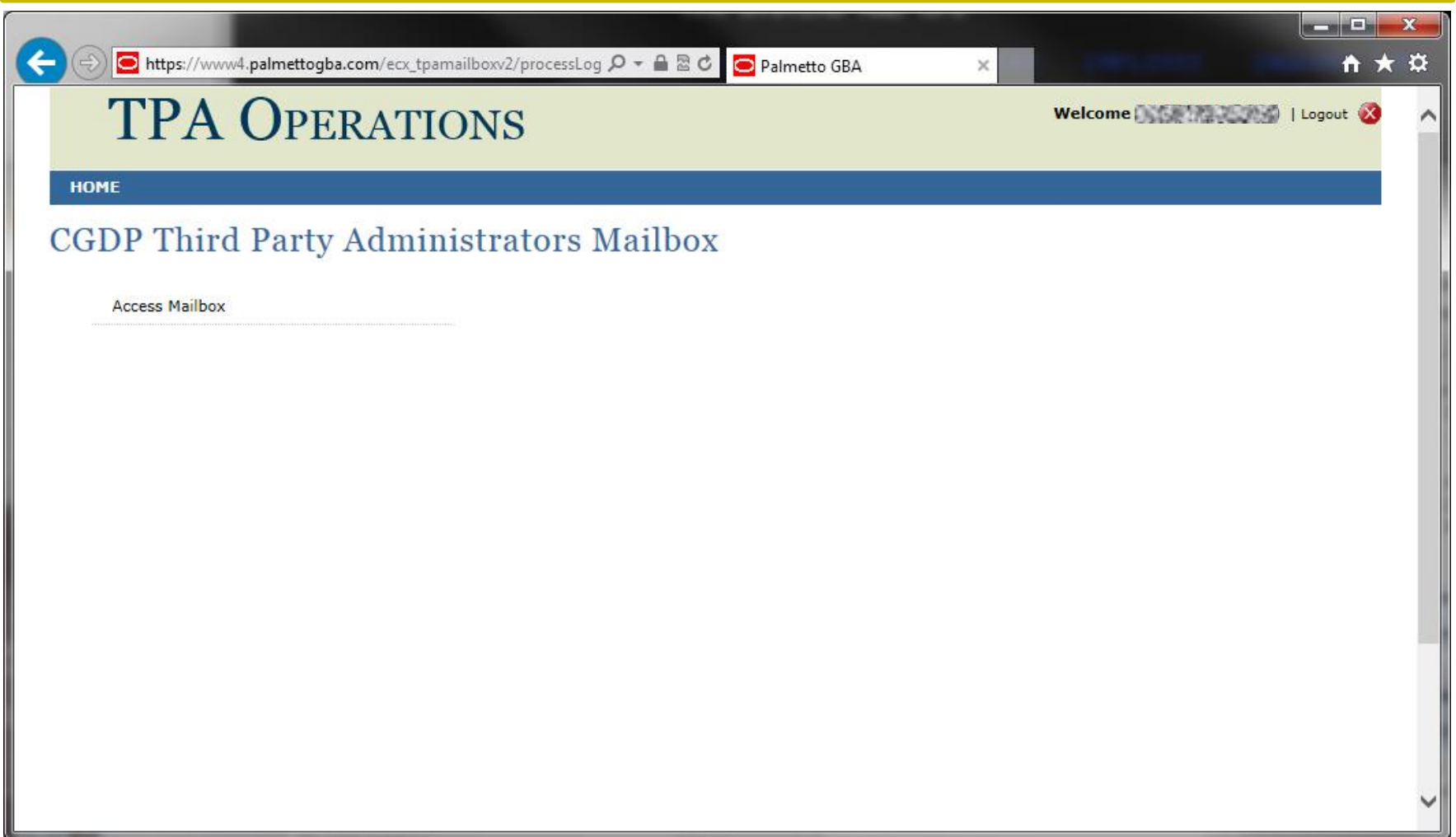


Login- via Sponsor Portal

- User ID is the contract number
- The point of contact is sent a temporary password and should maintain the permanent password
- All CGDP files are delivered to this Portal and the Payment Confirmation Report is also sent here
 - Excluded is the annual CGDP Reconciliation report (PRS), which is separately distributed



Sponsor Interface



The screenshot shows a web browser window with the following elements:

- Browser Address Bar:** https://www4.palmettogba.com/ecx_tpamailbox2/processLog
- Page Title:** TPA OPERATIONS
- User Greeting:** Welcome [username] | Logout
- Navigation:** HOME
- Main Content:** CGDP Third Party Administrators Mailbox
- Action Link:** [Access Mailbox](#)



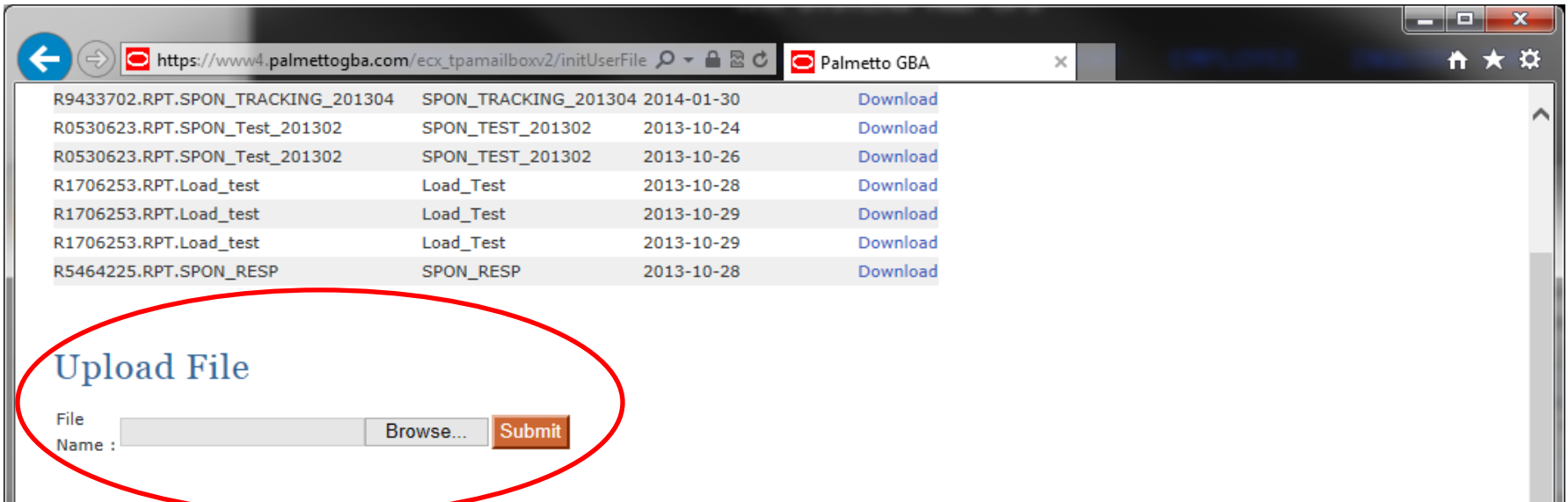
Download File

Displaying 1-10 of 38. [First/Prev] 1, 2, 3, 4 [Next/Last] Results Per Page : 10

Name	Description	Date	Download File
R0561442.RPT.SPON_RESP	SPON_RESP	2014-02-10	Download
R0561440.RPT.SPON_RESP	SPON_RESP	2014-02-10	Download
R0535886.RPT.SPON_RESP	SPON_RESP	2014-02-10	Download
R9433702.RPT.SPON_TRACKING_201304	SPON_TRACKING_201304	2014-01-30	Download
R0530623.RPT.SPON_Test_201302	SPON_TEST_201302	2013-10-24	Download
R0530623.RPT.SPON_Test_201302	SPON_TEST_201302	2013-10-26	Download
R1706253.RPT.Load_test	Load_Test	2013-10-28	Download
R1706253.RPT.Load_test	Load_Test	2013-10-29	Download
R1706253.RPT.Load_test	Load_Test	2013-10-29	Download
R5464225.RPT.SPON_RESP	SPON_RESP	2013-10-28	Download

Upload File

- Map to local drive where the file to be uploaded has been saved and then click the submit button



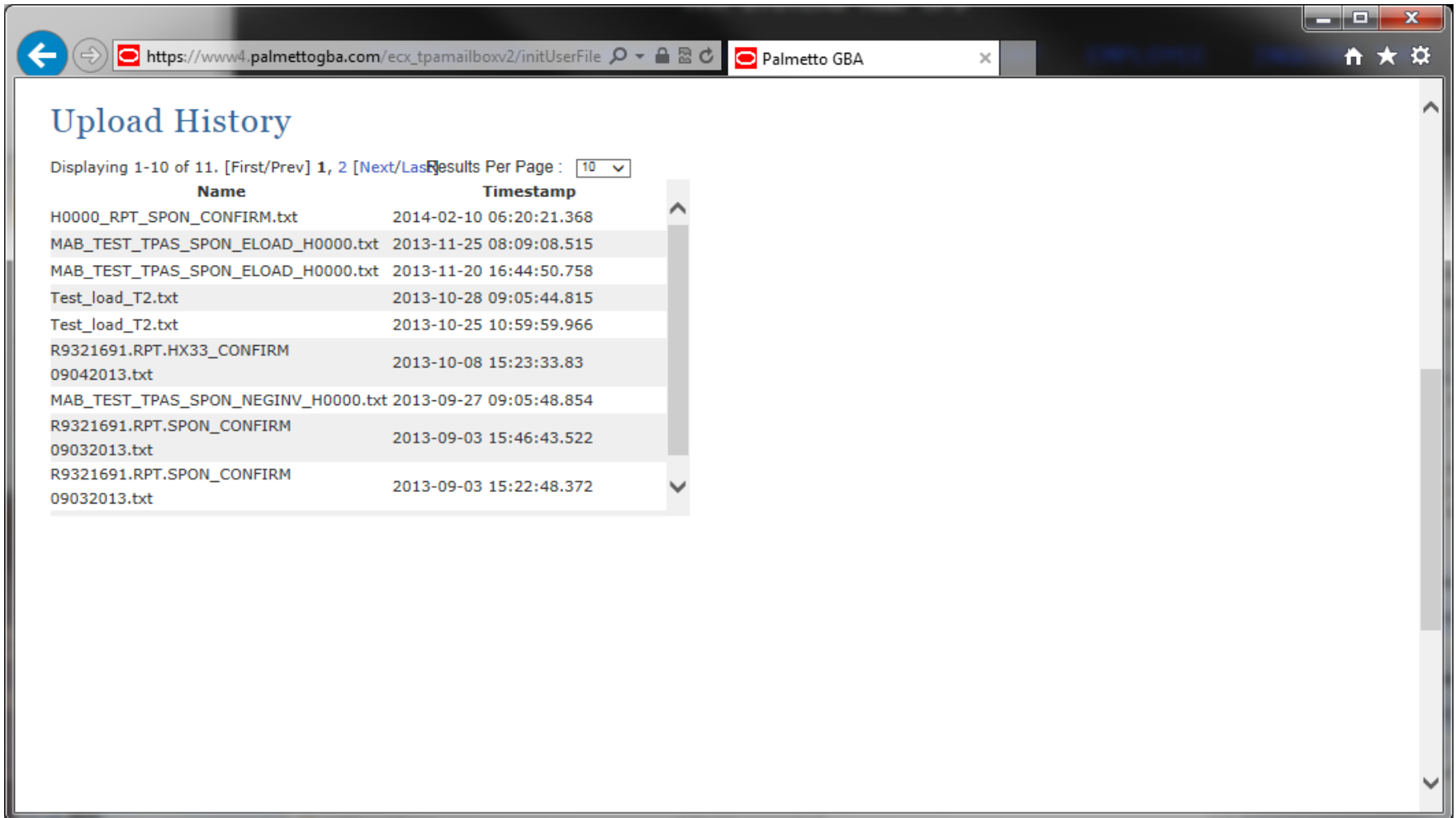
R9433702.RPT.SPON_TRACKING_201304	SPON_TRACKING_201304	2014-01-30	Download
R0530623.RPT.SPON_Test_201302	SPON_TEST_201302	2013-10-24	Download
R0530623.RPT.SPON_Test_201302	SPON_TEST_201302	2013-10-26	Download
R1706253.RPT.Load_test	Load_Test	2013-10-28	Download
R1706253.RPT.Load_test	Load_Test	2013-10-29	Download
R1706253.RPT.Load_test	Load_Test	2013-10-29	Download
R5464225.RPT.SPON_RESP	SPON_RESP	2013-10-28	Download

Upload File

File Name :



Upload History



Displaying 1-10 of 11. [First/Prev] 1, 2 [Next/Last] Results Per Page: 10

Name	Timestamp
H0000_RPT_SPON_CONFIRM.txt	2014-02-10 06:20:21.368
MAB_TEST_TPAS_SPON_ELOAD_H0000.txt	2013-11-25 08:09:08.515
MAB_TEST_TPAS_SPON_ELOAD_H0000.txt	2013-11-20 16:44:50.758
Test_load_T2.txt	2013-10-28 09:05:44.815
Test_load_T2.txt	2013-10-25 10:59:59.966
R9321691.RPT.HX33_CONFIRM 09042013.txt	2013-10-08 15:23:33.83
MAB_TEST_TPAS_SPON_NEGINV_H0000.txt	2013-09-27 09:05:48.854
R9321691.RPT.SPON_CONFIRM 09032013.txt	2013-09-03 15:46:43.522
R9321691.RPT.SPON_CONFIRM 09032013.txt	2013-09-03 15:22:48.372



Confirmation Responses

- Acceptance, Rejection or Discrepancy status of your confirmation will be reported in the Confirmation Response report

A list of response codes is shown on the following page



Confirming Payment – Error codes for rejected Payment Confirmation Reports

E001	INVALID REPORT PD	Reject
E002	REPORT PD IN TPAMT RECORD DOES NOT MATCH THE TPAMH	Reject
E003	REPORT PD IN TPACT RECORD DOES NOT MATCH THE TPACH	Reject
E004	INVALID FILE ID	Reject
E005	INVALID "P" NUMBER	Reject
E007	NO DATE ENTERED/INVALID, OR DATE IS > CURRENT DATE	Reject
E008	PAYMENT AMOUNT NOT NUMERIC	Reject
E009	INVALID CONTRACT	Reject
E010	INVALID RECORD TYPES IN FILE	Reject
E011	MISSING RECORD TYPES IN FILE	Reject
E012	CONFIRMED PAYMENT AMT <> INVOICE PAYMENT AMT	Discrepant
E013	DUPLICATE CONFIRMATION REPORT ALREADY CONFIRMED	Reject
E015	CONFIRM DATE PRECEDES INVOICE REPORT DISTRIBUTION DATE	Reject
E016	TPAMT TOTAL NOT EQUAL TO TOTAL OF ALL TPACT RECORDS	Reject

DISPUTE PROCESS



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Dispute Process

- The Manufacturer Dispute Submission File is created using information provided in the Manufacturer Data / Detail Report
 - See “Reports” section
- Part D Manufacturers will have 60 calendar days from the date of Invoice Receipt to submit a dispute file
 - Receipt of the invoice considered to be one calendar day after the TPA electronically transmits the Invoice to the Manufacturer
 - Or otherwise notified that it is available (e.g., it is posted on a secure web site for download)
- Only records being disputed should be included in the dispute file



Preparing the Dispute Submission

- Copy and rename the quarterly detail file as follows
R.#####.RPT.MANUF_DISPUTE
 - The ##### is a sequential number the you received on your Manufacturers Data Report
- You can use a text editor like Wordpad, Notepad or Textpad to edit the text file
 - Assistance converting the detail file into a dispute file can be found on the TPA website under “Dispute File Layouts” and then clicking on the “Dispute Layout Side by Side Comparison” link
- Save the file as a text file when finished editing
- Reminder – Only records being disputed should be included in the dispute file



Submitting Disputes

- Dispute Submission files are validated in two phases
 - First validation involves general syntax checking by the TPA
 - Run twice daily - \approx 8:45 a.m. and \approx 3:45 p.m.
 - Response reports transmitted to mailboxes by 9:30 a.m. and 4:30 p.m. ET
 - Second validation involves checking the content of the dispute(s) by the Drug Data Processing System (DDPS)
 - Run once each evening
 - Return reports transmitted to mailboxes by 9:30 a.m. the following day



Submitting Disputes

- Multiple dispute submissions on a daily basis are allowed if the dispute report is rejected by the TPA during the syntax validating phase
- However, only one dispute can be accepted, per day, per P#, and sent off to DDPS for the content validation phase



Correcting Dispute Submissions

- If CMS accepts at least one dispute record, it will be reviewed by DDPS
 - DDPS edits dispute files line-by-line, not by a file in its entirety
- The drug manufacturer may correct any rejections by DDPS by correcting the data and re-submitting the rejected records by the submission deadline
- Please allow enough time for Disputes Submission files to be corrected and resubmitted for both types of errors
 - Waiting until the last day of the submission deadline is not recommended



Dispute Process

- After the dispute line item has been accepted during the content validation phase, drug manufacturers can send supporting documentation and attachments to disputes@tpadministrator.com
- The TPA submits a status in the Dispute Resolution file to the drug manufacturer by the 60th day following the dispute file submission deadline
 - Status codes are reported in the "Dispute Disposition" field of the Dispute Resolution File with either an upheld or denied status



Dispute Process

- Sponsors have 90 days upon discovery (the date the Dispute Resolution file is distributed) to submit a corrected PDE to CMS
- Manufacturers can expect an adjustment on the invoice usually within one or two invoicing cycles after the release of the Dispute Resolution file
- Please note – The Sponsor is obligated to fix the incorrect data that caused the dispute and can adjust financial and/or non-financial fields to correct the disputed data. In other words, the Reported Gap Discount amount may or may not change due to an upheld dispute.



Denied Disputes

- If the dispute is denied, the drug manufacturer can submit an appeal to the Independent Review Entity (IRE)
 - Drug manufacturers can appeal within 30 days of receiving the decision reported within the dispute resolution file or 60 days after filing the dispute if no decision has been reached (whichever date is earlier)
- Appeals must be submitted through the IRE portal found on the TPA website
- The IRE must provide a decision within 90 days of receiving the appeal
- Drug manufacturers can appeal the IRE decision to the CMS Administrator



Further Dispute Information

- TPAdministrator.com
 - Dispute File Layouts
 - Dispute Resolution Report File Layout
 - Coverage Gap Discount Program Appeals
 - Dispute Edits
 - Dispute Layout Side by Side Comparison
 - Dispute Reasons
 - Dispute Return File
 - Dispute Submission File
 - Manufacturer Dispute Submission and Attachment Overview
 - Dispute Reminder



Contacting the TPA

- TPA website – <http://tpadministrator.com>
- Phone
 - Help Line: 1-877-534-2772 – Option 1
 - Hours: Monday thru Friday 8 a.m. to 7 p.m. ET
- General email inquiries regarding the invoicing and payment process should be sent to tpaoperations@tpadministrator.com
- Webinar slides will be posted to the TPA website
- Suggestions for future webinar topics should be sent to webinar@tpadministrator.com
- Questions related to dispute files, EFT information, invoice corrections <http://tpadministrator.com> – Website
 - disputes@tpadministrator.com – Dispute support documentation



Additional Information

- Detailed information can be found by reviewing the 2011 PDE Participants Guide and the 2014 PDE Reporting and Calculation Guidance
 - This information can be found on the TPA website, tpadministrator.com



Resources

- Medicare Drug Benefit Group
 - Questions related to the Manufacturers Agreement, changes of ownership, terminations, compliance / administrative-related issues, policy
 - Email address is CGDPandManufacturers@cms.hhs.gov
- Discount Program Manufacturer's Page
 - <http://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovGenIn/index.html?redirect=/PrescriptionDrugCovGenIn/>
- HPMS Website
 - Updating CMS contact and labeler code changes
 - <https://gateway.cms.gov> – Website
 - CMS_IT_service_desk@cms.hhs.gov – Password Resets
 - CMSHPMS_access@cms.hhs.gov – Non-password access assistance
- Independent Review Entity (IRE) for Discount Program appeals
 - <https://cgdpappeals.provider-resources.com/Default.aspx> – Website