TPA Manufacturer Webinar

Coverage Gap Discount Program (CGDP)

February 4th 2011

Hello and welcome
to the TPA's
Coverage Gap Discount
webinar for Manufacturers

Agenda

- **TPA Roles**
- **TPA Mailing List Registration**
- **Monthly Webinars**
- **Connectivity Hints**
- **Invoice Correction**
- **Schedule**
- **EFT Guidelines**
- **Reports and File Layouts**
- **Test File Information**
- **Low Volume**
- **Live Question and Answer Session**

TPA Roles Under The CGDP

- **Liaison between Part D Sponsors and Manufacturers in ALL matters related to the Coverage Gap Discount Program**

- **Coordinate notice to Manufacturers of Part D Sponsor Electronic Funds Transfer (EFT) information**

- **Distribute quarterly invoices and associated reports to Part D Sponsors and Manufacturers**

- **Process payment confirmation reports from Part D sponsors and Manufacturers**

- **Confirm "Payment in Full": Compare Payment Confirmation Report totals to Invoice Report totals; report any discrepancies to CMS**

Monthly Webinars

- **The TPA will be hosting a Manufacturer Webinar each month**
- **First Wednesday of the month @ 2:00 PM EST**
- **Possible topics for future presentations**

  - Dispute Procedure
  - Audits
  - File and Report Changes
- **Question and Answer session**

Connectivity to TPA Server

- SFTP – when reports are placed in your mailbox connect to the TPA server and download these reports from your "Outbound" directory

- SFTP - when sending confirmation of payment to the TPA place the file in your "Inbound" directory and upload

- Connect: Direct - reports are placed into dataset names provided by your organization. Confirmation reports are placed in dataset names provided by the TPA.

  Please Note: *The TPA will not access your system when distributing reports. You will access our server to receive and send reports*

Connection Tips

- Prior to testing an SFTP connection the TPA must have your IP address and public key loaded into our system

- The SFTP connection being established does not use a user name and password to authenticate. We use public key authentication
  - your public key should be SSH-2/DSA format
  - 1024 bits
  - When creating your public/private key combo it is not necessary to create a passphrase
  - We do not provide a public key to you

- The public key is directly linked to the SFTP software you choose to use. This portion of the test ensures that the public key you provide to us matches what is stored in your system

Connection Tips, continued

- The SFTP telnet test ensures that you are able to route through your firewall and our firewall based on the IP Address information you have provided to us.

- The IP address must be the address that is leaving your organization and attempting to connect to our server. If you are routing through a server the IP address leaving your organization may not be that of the computer the user is working from.

- An error message such as *"Could not open to host to port 22/ no response from server"* or *"unable to connect to port 22 host refused connection"* usually indicates a problem with the IP address you have provided to us.

- In most SFTP software the username should be populated with the Submitter ID we provide to you. This ID number typically begins with "XP" and should end with "PROD". Please keep in mind that all alpha characters within the Submitter ID should be upper case

TPA E-mail Registration

- **Please visit the TPA web site at the following address www.csscoperations.com.**

- **Under the TPA/Drug Manufacturer column select Register for Email Notifications.**

- **Complete the User Profile Page.**

- **On the User Profile Page under the "Sign up to receive updates on the following:" please ensure you select the Drug Mfg box.**

TPA Contact Information

- **All customer support will be provided through our existing Customer Service and Support Center (CSSC) located at Palmetto GBA LLC in Columbia, South Carolina**

- **We will offer ongoing support by our dedicated staff through the CSSC Help Line at 877-534-2772**

- **Hours of operations - Monday through Friday from 8:00am to 7:00pm EST**

- **Or send inquiries to our email address at: csscoperations@palmettogba.com**

- **Web site address www.CSSCOperations.com**

Invoice Correction

- **Section V (f) of Medicare Coverage Gap Discount Program Agreement: "The Manufacturer shall not withhold any invoiced discount payments pending dispute resolution with sole exception of invoiced amounts for applicable drugs <u>having NDCs not specified as being subject to the Agreement.</u>"**

- **Exception MEANS that a manufacturer may withhold discount payments for any NDCs with "labeler code(s)" that were NOT submitted to CMS by the manufacturer that was invoiced.**

- **Exception DOES NOT MEAN that a manufacturer may withhold discount payments for any NDCs with "labeler code(s)" that were submitted to CMS by the manufacturer that was invoiced because such NDCs are owned/marketed by another manufacturer.**

- **Exception DOES NOT MEAN that a manufacturer may withhold discount payments for any NDCs with "labeler code(s)" that were submitted to CMS by the manufacturer that was invoiced because such NDCs are expired/discontinued and no longer marketed**

- **EFT Banking Information File Layout – Feb 4**
- **EFT Banking Information File – Feb 19 (TPA will follow up with additional instructions.)**
- **Test File: Manufacturer Data File – Feb 15**
- **Routine Quarterly Invoice cycle begins – Apr 30, 2011**
  - Invoice reports distributed 30 days following end of quarter for quarters ending Mar 31, Sept 30 and Dec 31
  - Invoice reports distributed 60 days following end of quarter for quarter ending June 30

13 Quarterly Invoices

- **As recently established in 42 C.F.R. §423.466. Part D sponsors must coordinate benefits for three years following date of service.**

- **CMS will close the DDPS database thirty-seven months following the end of each benefit year. This schedule gives Part D sponsors three full years to coordinate benefits for claims with a December 31 date of service.**

- **The last invoice for the year 2011 will be released on March 31, 2014**

CGDP Quarterly Invoice Timeline for 2011 Benefit Year

Quarter Number	PDE Reporting Period End	Quarterly Invoice Distribution	Invoice Paid by	Invoice Payment Confirmed by	Payment Month of APPS Offset	Disputes Submitted by	Disputes Resolved by
Q1*	3/31/2011	4/30/2011	6/8/2011	6/13/2011	8/2011	6/29/2011	8/28/2011
Q2*	6/30/2011	8/31/2011	10/9/2011	10/14/2011	12/2011	10/30/2011	12/29/2011
Q3*	9/30/2011	10/31/2011	12/9/2011	12/14/2011	2/2012	12/30/2011	2/28/2012
Q4*	12/31/2011	1/31/2012	3/9/2012	3/14/2012	5/2012	3/31/2012	5/30/2012
Q5*	3/31/2012	4/30/2012	6/13/2012	6/18/2012	8/2012	6/29/2012	8/28/2012
Q6*	6/30/2012	8/31/2012	10/9/2012	10/14/2012	12/2012	10/30/2012	12/29/2012
Q7	9/30/2012	10/31/2012	12/9/2012	12/14/2012		12/30/2012	2/28/2013
Q8	12/31/2012	1/31/2013	3/10/2013	3/15/2013		3/31/2013	5/30/2013
Q9	3/31/2013	4/30/2013	6/8/2013	6/13/2013		6/29/2013	8/28/2013
Q10	6/30/2013	8/31/2013	10/9/2013	10/14/2013		10/30/2013	12/29/2013
Q11	9/30/2013	10/31/2013	12/9/2013	12/14/2013		12/30/2012	2/28/2014
Q12	12/31/2013	1/31/2014	3/10/2014	3/15/2014		3/31/2014	5/30/2014
Q13	3/31/2014	4/30/2014	6/8/2014	6/13/2014		6/29/2014	8/28/2014

EFT Banking Information

- The Medicare Coverage Gap Discount Program Agreement between CMS and the Manufacturers specifies the use of EFT to pay the full quarterly amount owed to each Sponsor

- Approximately 700 Sponsors could have quarterly payments due to them

- EFT Banking file will be released to Manufacturers who have established connectivity with the TPA

- Banking File may be downloaded from a secure mailbox on the TPA's network

- Banking information is subject to the Manufacturer Agreement Confidentiality Provisions

EFT Banking Information Guidelines

- **Sponsors have 5 days from receipt of payment to send the Sponsors Confirmation report to the TPA**

- **To make payments easily identifiable to the Sponsor include the following on your EFT transmission**
  - Manufacturer's company name
  - 15 character identifier example: CGYYQQ8888H1234

    CG = coverage gap

    YYQQ = Year and Quarter of the invoice

    8888 = P number without 'P'

    H1234 = Contract number

EFT File Layout

Field Name	Position	Picture	Field Length	Description/Values
MCO	1 – 5	X(5)	5	Contract Number
MCO Name				Contract Name
EIN			12	Federal Tax Identification Number
1099 Name				1099 Name
1099 Street Address 1				1099 Street Address Line 1
1099 Street Address 2				1099 Street Address Line 2
1099 City				1099 City
1099 State			2	1099 State
1099 Zip			10	1099 Zip
Bank Name 1				Sponsor's Bank Name Line 1
Bank Name 2				Sponsor's Bank Name Line 2
Bank City				Sponsor's Bank City
Bank State			2	Sponsor's Bank State
Bank ABA			9	Sponsor's Bank ABA Transit Routing Number
Bank Account Number			9	Sponsor's Bank Account Number
EFT Effective Date		X(10)	10	Date this EFT record becomes effective
EFT Obsolete Date		X(10)	10	Date this EFT record becomes obsolete. Default to 12/31/2099

EFT Sample File

MCO	MCO NAME	EIN	1099 NAME	1099 STREET ADDRESS 1	1099 STREET ADDRESS 2	1099 CITY	1099 STATE	1099 ZIP	BANK NAME 1	BANK NAME 2	BANK CITY	BANK STATE	BANK ABA	BANK ACCT#
E9999	IBT VOLUNTARY EMPLOYEE BENEFITS TRUST	999999999999	1099 Name	1099 Add 1	1099 Add 2	1099 City	US	20001	BANK		CITY	US	999999999	999999999
E9999	NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION	999999999999	1099 Name	1099 Add 1	1099 Add 2	1099 City	US	22203	BANK		CITY	US	999999999	999999999
E9999	C AND O EMPLOYEES HOSPITAL ASSOCIATION	999999999999	1099 Name	1099 Add 1	1099 Add 2	1099 City	US	24422	BANK		CITY	US	999999999	999999999

*Some data has been intentionally obscured to preserve confidentiality

**Sample file is for illustrative purposes only

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File Format Highlights

- **File Formats posted on TPA website**
- **TPA sends Manufacturers two files:**
  - Manufacturer Data Report
  - Manufacturer Invoice Report

    In the event an individual Manufacturer has no invoice items for a quarter, the TPA will send that Manufacturer a report stating "No invoice created for this quarter".
- **Manufacturer sends TPA one file:**
  - Confirmation of Payment Report
- **Dispute file format to be developed**

File Format Highlights
Manufacturer Data Report

- **Data record basically unchanged since Nov draft**
  - Report ID and Previous Report ID correspond to 13 quarterly invoice cycles
  - Contract/PBP is not reported
- **Roll-ups: detail records roll up to Labeler subtotal; Labeler subtotals roll up to Manufacturer total**
  - Introducing additional reporting functionality for Low Volume reporting; no Manufacturer impact early in the year

Low Volume: Data cells with 10 or fewer individuals

<u>CMS Policy for Privacy Act Implementation & Breach Notification</u>
4 of 25 CMS-CIO-POL-PRIV01-01 July 23, 2007

4.B.8. Statistical, aggregate or summarized information created as a result of analysis conducted using identifiable CMS data obtained under CMS-approved projects/studies may only be disclosed if the data are not individual-specific and the data are aggregated to a level where no data cells contain 10 or fewer individuals. CMS must review all reports, manuscripts, files, etc. to be re-released. This review pertains to all forms of publication, including information to be posted to the Internet. This review ensures that the reports, manuscripts, files, websites, etc. contain no data elements or combinations of data elements that by themselves or in addition to other data files and/or sources, could allow for the deduction of the identity of an individual and that the level of cell size aggregation meets the stated requirement. Only after such review has occurred and CMS has provided written approval for the re-release of the reformatted CMS information (includes e-mail correspondence) is the data requestor legally authorized to re-release the data.

Low Volume Definition and Reporting

- **Low Volume definition: 10 or less beneficiaries with same NDC 9 and same pharmacy**

- **To comply with CMS policy, Manufacturer Data Report has two detail record types:**

  DETCG - Manufacturer Data Record at PDE Level

  DETLV - Data Record for Low Volume Activity (summarized at Labeler level)

- **Low Volume Summarization no longer applies when number of beneficiaries in the group exceeds 10.**

- **Low Volume status and counts are updated immediately before creating the quarterly invoice reports.**

Reporting when Low Volume Status Changes

- **Number of records aggregated in Low Volume Summary Records (Record Type DETLV) will routinely decrease throughout the year progresses as more beneficiaries move into the Coverage Gap.**

- **To minimize complex reporting transactions when Low Volume status no longer applies, Low Volume Summary records will not be invoiced early in the year.**

- **Later in the year when Low Volume Groups are invoiced, the Manufacturer Data Report will identify records previously reported in the Low Volume**

- **Prior Low Volume Flag on DETCG record identifies record that no longer has Low Volume Status.**

File Format Highlights
Manufacturer Invoice Report

- **Aggregate gap discounts at Labeler Level**
- **To align Invoice Report with Payment Confirmation at contract level**
  - Removed Parent Organization roll-up
  - Labeler summary records roll up to Contract
- **Invoice report is a versatile format. With minimal change, Manufacturers convert the Invoice Report to the Confirmation of Payment report.**

Manufacturer Confirmation of Payment Report

Steps to create Confirmation of Payment Report from Invoice Report:

1. Add File date to Manufacturer Header Record (TPAMH)

2. Manufacturers have a Contract Trailer Record for each contact they must pay. On each Contract Trailer (TPACT) populate

Field 12 - DATE OF PAYMENT

Field 13 - PAYMENT AMOUNT

Field 14 - EFT INDIVIDUAL IDENTIFICATION NUMBER

3. Send file to TPA from Manufacturer's secure mailbox

The Manufacture has sole responsibility for submitting the Confirmation of Payment Report and sending it to the TPA.

Each quarter the TPA expects a single, complete Confirmation of Payment Report from each manufacturer who received an invoice.

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Live Call-In

- **Join us for a LIVE Question and Answer Call-In immediately after this presentation**
- **Please Hang up, then dial**

   (888) 390-3983 **meeting code 70795**