Coverage Gap Discount Program (CGDP) Manufacturer Portal

Disputes
Users Guide

Revision Date: 03/06/2019
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Introduction

Welcome to the Coverage Gap Discount Program (CGDP) Manufacturer Portal Dispute Users Guide. This guide provides you, the Manufacturer, information on accessing Dispute return and resolution reports located in the CGDP Portal's Disputes Dashboard and using the Disputes functionality to build and submit dispute requests.

The Disputes functionality is available for Manufacturers participating in the CGDP (the Program) to submit dispute requests on current quarter prescription drug event (PDE) line items in order to request a CMS review. According to the terms in the Manufacturers' Agreement, Part D Manufacturers will have sixty (60) calendar days from the date of Invoice Receipt to submit a dispute file. The *Invoice Receipt Date* is as stated in the Manufacturers Agreement Section II (b):

> *Receipt of the invoice shall be considered to be one (1) calendar day after the TPA electronically transmits the invoice to the Manufacturer or otherwise notifies the Manufacturer that it is available (e.g., it is posted on a secure web site for download).*

Disputed PDE line items included in a dispute file *must* be paid by the invoice payment deadline, also known as the "Invoice Paid By 38th Calendar Day After Receipt" as defined in the ***CGDP Calendar***, even though the Manufacturer is disputing the line item.

Manufacturers are able to create dispute files for disputed PDE line items by using the information provided in the current quarter's Data report. Manufacturers have two options for creating dispute files: manual text file format or Dispute Builder functionality. Submission of uploaded manual text files or Dispute Builder-created files are performed in the CGDP Portal. When creating dispute files, only PDE's for a single P number should be included in a file. Files containing multiple P numbers for a Corporate ID will error out in the Portal. After submission of the dispute files, Manufacturers can review and download reports detailing the results of submitted disputes editing on the Dispute Return or the final determination for reviewed disputes on the Dispute Resolution files loaded to the Disputes Dashboard. Additional details on the Disputes Dashboard, Dispute Builder, and Dispute Submission functionality is

The CGDP Portal, here forward known as the Portal, will provide Manufacturers the ability to perform the following Dispute functions:
- Invoice dispute filing
- Return and resolution reports retrieval

This ***CGDP Manufacturer Portal Disputes Users Guide*** will provide the information necessary to process Disputes, including tasked-based instructions for creating, submitting, and reviewing dispute files and dispute reports retrieval.

CGDP Portal Login

The CGDP Portal is a U.S. government information system. To access the Dispute functionality a user must have authorized access to the Portal.

Once the Portal Login page displays, the Welcome and Site Use warning notification is presented to the authorized user and they are provided with the ability to review the Terms of Use of the application.

Authorized users of the Portal application must adhere to CMS information security policies, standards and procedures.

To access the Portal, Manufacturers will enter their credential information provided by the TPA Operations Team. The User ID is the Corporate ID number, assigned by the CMS Health Plan Management System (HPMS), which categorizes the information loaded to the Portal. Information is limited to only Manufacturer P number(s) associated with the Corporate ID. The TPA provides the initial temporary password to access the Portal to the Manufacturer via email, once the onboarding process is complete.

Detailed login instructions are located in the ***CGDP Manufacturer Portal Introduction and Login Users Guide*** located under ***References*** on the *TPAdministrator.com*. Instructions contained within the guide include:
- Initial Security Data Set Up
- Daily Login
- Account Maintenance
- Navigation of the Portal and its tabs and links
  Note: Users will not have the ability to view other Manufacturers' data.

To exit out of the Portal properly, select the *Logout* link in the upper right hand corner of the active page.

> **Note**: Failing to select the *Logout* link to exit the system will lock a user out of the Portal for a minimum of 30 minutes.

CGDP Portal Disputes Tab

The disputes functionality provides Manufacturers with the ability to dispute invoiced PDE line item records due for a current reporting period. The **Dispute Dashboard** allows Manufacturers the ability to review statuses and results of submitted dispute files for both the current period and prior period's dispute reports.

The **Disputes** tab, displayed as the **Dispute Dashboard**, allows a user to review dispute submission return and resolution files. Manufacturers are able to submit disputes for PDE line item records included in the current quarterly invoices that they deem to be incorrect and can request review by the TPA and CMS. TPA receives dispute files and performs multiple validations prior to final submission to CMS.

> **Note**: PDE line item invoiced for the quarter _must_ be paid even if a dispute is being submitted for the specific PDE.

The following information provides an overview of the **Dispute Dashboard** located by activating the **Disputes** tab.

The **Disputes** tab contains five (5) regions.
1. **Tabbed region** displays the tab that is currently active and tabs available for selection.
2. **Filter region – Disputes** allows a user to search data listed by the defaulted Corporate ID number.
3. **Current Cutoff Calendar region** displays specific quarter cutoff dates, in a MM/DD/YYYY format, for the most recent quarter. The current quarter date displays in the title bar of the region, in parentheses, displayed in YYYYQQ format.
4. **Return File region** displays reports containing the Number Accepted (validated) and Number Rejected (invalidated) dispute return file for specific reporting periods that have completed all CMS-system edits. Accepted line item will be sent to CMS for evaluation and resolution. Rejected line item records will require correction and resubmission to be eligible for CMS evaluation .Only correct records should be resubmitted, otherwise previously Accepted dispute records will be rejected with a duplicate error.

5. **Resolution File region** displays reports containing the <u>Number Upheld</u> (approved) and <u>Number Denied</u> dispute resolution files for specific reporting periods that have been reviewed and determinations made by CMS. Upheld line items will require adjustment by Sponsors. Denied line items will remain unchanged.

The upcoming pages will describe each region and its associated functions.

Tabbed Region – Disputes

The **Tabbed region** allows a user to select different activities to perform while accessing the system. In this example, the **Disputes** tab is active.

| Home | Payments | Completed | Receipts | Reports | Disputes |
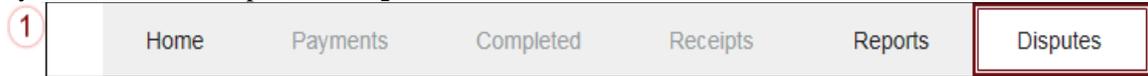
Filter Region – Disputes

The **Filter region – Disputes** contains three (3) columns to assist a user with narrowing dispute search criteria.

A Corporate ID: XP1__6   B P Number: ALL ▾   C Reporting Period: ALL ▾
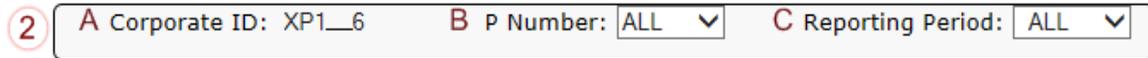
> A. <u>Corporate ID</u> column defaults to the Corporate ID utilized to access the system.
> B. <u>P Number</u> field displays the P number. This field contains a drop down list that will display P numbers associated with the Corporate ID.
> > **Note**: This field will only allow updates to P numbers that are associated with the Corporate ID and have had dispute return and resolution reports loaded to the Portal.
> C. <u>Reporting Period</u> field allows a user to view all applicable reporting periods or select specific reporting periods from the drop down list.

Current Cutoff Calendar Region

The **Current Cutoff Calendar region** displays important program cutoff dates for the current quarter.

The calendar region contains five (5) auto-populated fields to keep users aware of specific due dates for the current quarter.

A **Current Cutoff Calendar (Quarter 201503)**
B **Invoice Paid By:** 12/09/2015   C **Dispute Submission:** 01/31/2016
D **Invoice Distribution:** 10/31/2015 E **Dispute Distribution:** 03/01/2016

> A. <u>Current Cutoff Calendar (Quarter YYYYQQ)</u> field displays the current quarter in an YYYYQQ format.
> B. <u>Invoice Paid By</u> field displays the due date for Manufacturers to pay amounts invoiced to each contract, known as the "*Invoice Paid By 38th Calendar Day After Receipt*" as listed on the **_CGDP Calendar_**. Invoice payments are due to be paid by the Manufacturer within but not over 38 calendar days after the '*Quarterly Invoice Receipt Date*", which is the next calendar day after the "*Quarterly Invoice Distribution*" date on the **_CGDP Calendar_**.
> > **Note**: TPA recommends that invoices are paid prior to the payment due date or the "*Invoice Paid By 38th Calendar Day After Receipt*" date, not on the due date. Initiating payment prior to the due date will allow for error-free processing of Portal-initiated ACH payments.
> > Payments that error out on the due date are not considered as initiated and will require special handling between the Manufacturer and the TPA. Payments that do not meet the "*Invoice Paid By 38th Calendar Day After Receipt*" due date, could be subject to civil monetary penalties (CMP) assessed by CMS as per the Manufacturer agreement.

C. Dispute Submission field displays the last date Manufacturers can submit disputes for the quarter. The Dispute Submission date, also known as the *"Dispute Submission Deadline"* on the **CGDP Calendar**, is sixty (60) calendar days after the *"Quarterly Invoice Receipt Date"*.

The TPA recommends that Manufacturers submit disputes as soon as they are determined, within the 60-calendar day range, to allow for review of files for correct data inclusion.

> **Note**: Dispute records must pass multiple system verification edits, obtain a status of *Passed* (on the Dispute Submission tab), and appear in the *Number Accepted* (on the Disputes tab), prior to final submission to CMS for review.

D. Invoice Distribution field displays the date the TPA loads the invoices to the Portal.
E. Dispute Distribution field displays the last date TPA/CMS will provide response reports for disputes filed for the current quarter. The Dispute Distribution date, also known as the *"Dispute Resolution Deadline"* on the **CGDP Calendar**, is sixty (60) calendar days after the Dispute Submission date.

Return File Region

The **Return File region** on the **Disputes** tab displays information regarding submitted dispute records submitted via the Portal. Dispute record files process through multiple edits prior to submission to CMS. Submitted dispute records may appear with an *Accepted* status, in the Number Accepted column, where some or all of the dispute line item records included in the submitted file pass validation edits. Submitted records may also appear with a *Rejected* status, in the Number Rejected column, where some or all of the line item records included in the submitted file do not pass validation.

> **Note**: *Rejected* line item records will require correction and resubmission to be eligible for CMS evaluation, prior to the dispute deadline.

The **Return File region** contains eight (8) columns that assist a user in reviewing dispute file validation processing prior to submission to CMS for review and decision.

A Return File	B Download	C Download Date	D Reporting Period	E P Number	F Number Accepted	G Number Rejected	H Total
Dispute_Return_R	○	Last downloaded on 09/21/2015 @ 4:29 PM	201403	P1__6	4574	415	4989
Dispute_Return_R	○		201403	P1__7	0	2	2
Dispute_Return_R	○		201403	P1__1	69	32	101

A. Return File column displays a unique file name of the dispute file validated.
B. Download column provides a radio button to allow a user to select, download, and review specific return reports for accepted and rejected line items.
C. Download Date column displays the most recent download date of a return report.
D. Reporting Period column displays the reporting period associated with disputed invoices contained in the file.
E. P Number column displays the P number associated with the dispute return report.
F. Number Accepted column displays the number of records that passed validation in a submitted dispute file and are eligible for submission to CMS for review.
G. Number Rejected column displays the number of records that failed CMS' validation in a submitted dispute file.

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Note: *Rejected* records require correction and resubmission to be eligible for CMS evaluation. Only the correct records should be resubmitted. Previously submitted *Accepted* dispute records will reject with a duplicate error code.

H. Total column displays the total number of records included in the Return report.

Resolution File Region

The **Resolution File region** on the **Disputes** tab displays information regarding the disposition of dispute files. Resolution files are loaded to the Portal on the Dispute Distribution date for the applicable quarter, also known as the *"Dispute Resolution Deadline"* on the **CGDP Calendar**.

The **Resolution File region** contains eight (8) columns that assist a user in reviewing final determinations provided by CMS.

A Resolution File	B Download	C Download Date	D Reporting Period	E P Number	F Number Upheld	G Number Denied	H Total
Dispute_Resolution_R2015082	○	Last downloaded on 01/15/2016 @ 10:52 AM	201501	P1__6	1	3236	3237
Dispute_Resolution_R	○	Last downloaded on 01/15/2016 @ 10:42 AM	201501	P1__6	1	3236	3237
Dispute_Resolution_R2015082	○		201501	P1__1	0	18	18
Dispute_Resolution_R	○		201501	P1__1	0	18	18
Dispute_Resolution_R	○		201402	P1__6	311	4955	5266
Dispute_Resolution_R	○		201402	P1__1	13	87	100

A. Resolution File column displays the unique file name of the resolved dispute file received.

B. Download column displays a radio button to allow a user the ability to select, download, and review specific reports for upheld and denied line items.

C. Download Date column displays the most recent download date of a resolution report.

D. Reporting Period column displays the reporting period associated with disputed invoices contained in the submitted dispute file.

E. P Number column displays the P number associated with the resolved dispute report file.

F. Number Upheld column displays the number of dispute records within a dispute file upheld during CMS review.

G. Number Denied column displays the number of dispute records within a dispute file denied during CMS review.

H. Total column displays the total number of records included in the Resolution report.

CGDP Portal Instructions – Disputes

Accessing Disputes Return and Resolution files

Manufacturers are able to utilize the **Disputes Dashboard** in the Portal to review Dispute Return and Dispute Resolution reports for submitted disputed invoice line item records.

This instruction provides direction on accessing the Dispute Return and Resolution reports functionality.

1. Authorized end users will access the Portal to review disputes on the **Dispute Dashboard**. Instructions for logging into the Portal can be located in the ***CGDP Manufacturer Portal Introduction and Login Users Guide*** under ***References*** on the *TPAdministrator.com* website.

2. After successful login, the **Home** tab will appear. Select the **Disputes** tab to access the **Dispute** Dashboard and review the report types available for Manufacturers for the reporting period.

3. To view a specific Dispute Return report file in a text file format, populate the radio button in the <u>Download column</u> that corresponds to the appropriate report. The <u>Download</u> radio button is located in the **Return File region** of the **Dispute Dashboard**.

4. Select one (1) of the decision buttons in the message that appears at the bottom of the screen.
   - *Open* to view the data in text file format
   - *Save* to save the data in text file format
   - *Cancel* to exit the decision message

This example displays the selected *Open* button.

5. After selecting the *Open* button, review the downloaded text file of the dispute return report.

   Note: The Dispute Return File report format is listed under ***Manufacturer Disputes*** on the *TPAdministrator.com* website.

6. Once review of text file is complete, return to the **Disputes** tab.

7. The **Return File region** will display the date and time of the last download in the <u>Download Date</u> column for the relevant Dispute Return report.

8. To view a specific Dispute Resolution report in a text file format, populate the radio button in the <u>Download</u> column that corresponds to the appropriate report. The <u>Download</u> radio button is located in the **Resolution File region** of the **Dispute Dashboard**.

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9. Select one (1) of the decision buttons in the message that appears at the bottom of the screen.
   - *Open* to view the data in text file format
   - *Save* to save the data in text file format
   - *Cancel* to exit the decision message

This example displays the selected *Open* button.

10. After selecting the <u>Open</u> button, review the downloaded text file of the dispute resolution report.

> **Note**: The Dispute Resolution Report File Layout is listed under *Manufacturer Disputes* on the *TPAdministrator.com* website.

11. Once review of text file is complete, return to the **Disputes** tab.

12. The **Resolution File region** will display the date and time of the last download of the specific dispute resolution report in the Download Date column.

You have now completed accessing Dispute Return and Resolution reports on the **Disputes** tab.

CGDP Portal Dispute Builder Tab

The Portal provides a **Dispute Builder** to assist users in creating dispute files from the data files received for the current quarter. Utilizing the dispute builder will assist Manufacturers in creating dispute files with required information needed to support disputed PDE line item records. Users are able to select individual or multiple PDE line item records from the data file, select the applicable dispute reason code, and enter the required data for supporting the selected line items.

The **Dispute Builder** tab is made visible by positioning the cursor over the **Disputes** tab. The **Dispute Builder** will assist users in creating dispute files that successfully pass the TPA and CMS pre-review edits in a timely manner.

> **Note:** Obtaining a *Passed* status on the pre-review edits does not mean that the disputed invoice line items have been upheld by CMS. The *Passed* status means that the dispute file contains the required information to allow the dispute file to be subjected to a secondary review edit process. Once the secondary review edits are completed and the file receives an *Accepted* status, CMS will receive and review the dispute request to provide a determination on upholding or denying the dispute.

> **Note**: Dispute files can only contain data records for a single P number. Files containing multiple P number records for a Corporate ID will error out in the Portal.

The **Dispute Builder** tab contains seven (7) regions.

1. **Tabbed region** displays the tab that is currently active and tabs available for selection.
2. **Selection Criteria Form button**, displayed as the *"Click here to add data line items."*, allows a user to open the **Selection Criteria Form** to add PDE line item records to a dispute file.
3. **Current Cutoff Calendar region** displays specific quarter cutoff dates in a MM/DD/YYYY format for the most recent quarter. The current quarter date displays in the title bar of the region, in parentheses, in YYYYQQ format.
4. **PDE Line Item region** displays PDE line item records selected via the **Selection Criteria Search Form**.
5. **Dispute Builder *Save* button** allows a user to save the invoice line item records that have been loaded to the **PDE Line Item region**.
6. **Dispute Builder *Delete All* button** allows a user to delete all PDE line item records that have been loaded to the **PDE Line Item region**.

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7. **Dispute Builder *Complete Dispute File* button** completes the dispute file containing all selected PDE line item records for a specific P number and prepare it for submission in the Portal.

The upcoming pages will describe each region and its associated functions.
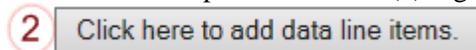
Tabbed Region – Dispute Builder

The **Tabbed region** allows a user to select different activities to perform while accessing the system. In this example, the **Dispute Builder** tab is active.

> **Note**: The **Dispute Builder** and **Dispute Submission** tabs are only visible when the cursor is hovering over the **Disputes** tab.

Selection Criteria Form Button

The *Selection Criteria Form* **button**, displayed as the "*Click here to add data line items"* button, allows a user to open the **Selection Criteria Form** and enter criteria to search for and include PDE line item records in a dispute file for submission to CMS evaluation. The **Selection Criteria Form** and description of its five (5) regions are discussed in the upcoming pages.

Selection Criteria Form

The **Selection Criteria Form** contains five (5) regions:

A.   **Selection Criteria Search region** provides search fields for a user to limit the number and type of PDE line item records displayed, based on the criteria entered in each field or selected from the combo box menus. Definitions of each field or combo box will appear in a subsequent section of the **Selection Criteria Form** introduction.

B.   **Dispute Region for Selected Lines (Optional) region** allows a user to select a dispute reason code and supporting reason code information for multiple PDE line item records requiring the same reason code.

C.   **Selection Results region** displays specific PDE line item records based on the criteria used in the **Selection Criteria Search region**. Definitions of each column heading will appear in a subsequent section of the **Selection Criteria Form** introduction.

D. ***Add Selected to Dispute File* button** allows a user to add selected PDE line item records to the dispute file.

E. ***Return to Dispute Builder*** button allows a user to exit the Selection Criteria Form and return to the Dispute Builder tab.

Description of each of the five (5) **Selection Criteria Form** regions appears on the upcoming pages with their associated functions.

Selection Criteria Search Region

The **Selection Criteria Search region** assists users in limiting the PDE line item records displayed when creating a dispute file. Users are able to enter specific data into each field to assist with retrieving specific PDE lines containing matching information.

This region contains twelve (12) fields that assist a user in searching line items.

i.   P Number field contains a combo box drop down listing that provides all active P numbers associated with the Corporate ID.

ii.   Product Service ID field allows a user to enter the National Drug Code (NDC) number.

iii.   Service Provider ID field allows a user to enter the identifier for the Service Provider, such as a National Provider Identifier (NPI), National Council of Prescription Drug Programs (NCPDP), Unique Physician Identification Number (UPIN), Federal Tax Number, or State License Number.

iv.   Prescription Reference Number field allows a user to enter a unique reference number for a prescription assigned by a plan.

    Note: The Prescription Reference Number must be unique for and date of service and Service Provider ID combination.

v.   Date of Service (yyyyMMdd) field allows a user to enter a date in YYYYMMDD format. Also provides the required combo box drop down menu field, when a date of service is entered, to select qualifiers such as equal to (=), greater than (>), less than (<), greater than or equal to (> =) or less than or equal to (< =).

vi.   Gap Discount Amount field allows a user to enter the net payment amount for the current quarter. Also provides the required combo box drop down menu field to select qualifiers for dates entered, such as equal to (=), greater than (>), less than (<), greater than or equal to (> =) or less than or equal to (< =). The derived amount calculated as the reported Gap Discount Current Amount minus the reported Gap Discount Previous Amount.

vii.   Quantity Dispensed field allows a user to enter number of units, grams, milliliters for a dispensed prescription. Also provides the required combo box drop down menu field allows a user to select qualifiers for quantities dispensed, such as equal to (=), greater than (>), less than (<), greater than or equal to (> =) or less than or equal to (< =).

    Note: If compounded item, total of all supplied ingredients calculated as quantity dispensed.

      viii.   Previous Discount Amount field allows a user to enter a reported Gap Discount from the preceding data report when the invoiced PDE record represents an adjustment to a previously invoiced PDE record. Also provides the required combo box drop down menu field allows a user to select qualifiers for amounts entered, such as equal to (=), greater than (>), less than (<), greater than or equal to (> =) or less than or equal to (< =).

      ix.   Days' Supply field allows a user to enter the number of days' supply a Sponsor covered for a prescription.

      x.   Current Discount Amount field allows a user to enter the new Gap Discount amount invoiced for the current quarter.

      xi.   Search button allows a user to initiate PDE line item records search based on the criteria entered into the applicable fields.

      xii.   Clear Criteria button allows a user to clear all criteria fields.

Dispute Reason for Selected Lines (Optional) Region

The **Dispute Reason for Selected Lines (Optional) region** allows a user to select a specific dispute reason code from the combo box drop down to be applied to multiple PDE line item records in a dispute file. When used, the reason code will be applied to all selected PDE line item records selected in the **Selection Criteria Search region** and will assist in classification of similarly disputed line item records.

D01 - Duplicate Invoice Item
D02 - Closed Pharmacy
D03 - Not PART D Covered Drug
D04 - Excessive Quantity
D06 - High Price of the Drug
D07 - Last Lot Expiration Date
D09 - Marketing Category is not NDA or BLA
D11 - PDE improperly invoiced beyond manufacturer agreement invoice period
D13 - Gap discount for disputed PDE exceeds maximum discount amount for a single PDE
D14 - Total accumulated gap discounts reported across multiple PDEs for a single beneficiary exceed cumulative maximum discount amount
D99 - Other

Selection Results Region

The **Selection Results region** displays the selected PDE line item records based on the search criteria entered in the **Selection Criteria Search region**.

This region contains eleven (11) columns that assist a user in displaying selected line item records.

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i.   Checkbox column allows a user to populate a checkmark for a specific PDE line item record to be included in the dispute file, based on the search criteria entered into the fields located on the **Selection Criteria Search region**.
ii.   P Number column displays the P number assigned to the specific PDE line item record.
iii. Prescription Ref # column displays the prescription reference (ref) number (#) assigned to the specific PDE line item record.
iv.   Product Service ID column displays the product service ID assigned to the specific PDE line item record.
v.   Service Provider ID column displays the service provider ID assigned to the specific PDE line item record.
vi.   Days' Supply column displays the number of days prescriptions supplied and covered by the Sponsor for the specific PDE line item with a three (3)digit value.

vii. Qty Dispensed column displays the quantity (Qty) of the prescription dispensed and covered by the Sponsor for the specific PDE line item record.
viii. Date of Service column displays the date of service for the specific PDE line item record in YYYY-MM-DD format.
ix.   Gap Discount Amount column displays the dollar amount of the specific PDE line item record.
x.   Previous Discount Amount column displays the dollar amount of the specific PDE line item record for the prior reporting period.
xi.   Current Discount Amount column displays the dollar amount of the specific PDE line item record for the current reporting period.

Add Selected to Dispute File Button

The *Add Selected to Dispute File* button allows a user to add the individual PDE line items containing a checkmark to the **PDE Line Item region** of the **Dispute Builder** tab. These selected PDE line items will become part of the submitted dispute file forwarded to TPA/CMS for review.
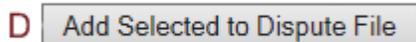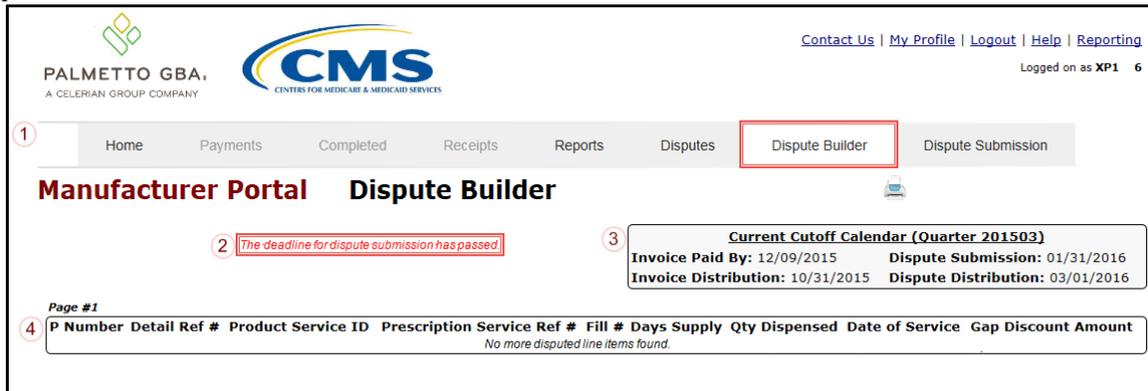

Return to Dispute Builder Button

The *Return to Dispute Builder* button allows a user to exit the **Selection Criteria Form region** to return to the **Dispute Builder** tab.
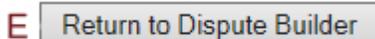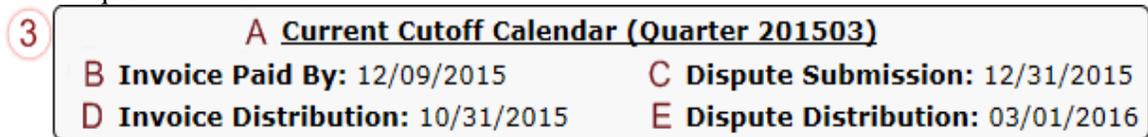
Once the Dispute submission deadline has passed, a system message will replace the *Selection Criteria Form* button. The system message states, "*The deadline for dispute submission has passed.*"

Current Cutoff Calendar Region

The **Current Cutoff Calendar region** displays important program cutoff dates for the current quarter.

The calendar region contains five (5) fields to keep users aware of specific due dates for the current quarter.

A. Current Cutoff Calendar (Quarter YYYYQQ) field displays the current quarter in an YYYYQQ format.
B. Invoice Paid By field displays the due date Manufacturers have to pay amounts invoiced to each contract, known as the "*Invoice Paid By 38th Calendar Day After Receipt*" as listed on the **CGDP Calendar**. Invoice payments are due to be paid by the Manufacturer within but not over 38 calendar days after the "*Quarterly Invoice Receipt Date*",, which is the next calendar day after the "*Quarterly Invoice Distribution*" date on the **CGDP Calendar**.

> **Note**: TPA recommends that invoices are paid prior to the payment due date or the "*Invoice Paid By 38th Calendar Day After Receipt*" *date*, not on the due date. Initiating payment prior to the due date will allow for error-free processing of Portal-initiated ACH payments.
> Payments that error out on or after the due date are not considered as initiated and could be subject to civil monetary penalties assessed by CMS as per the Manufacturer agreement.

C. Dispute Submission field displays the last date Manufacturers can submit disputes for the quarter. The Dispute Submission date is sixty (60) calendar days after the "*Quarterly Invoice Receipt Date*" *date* on the **CGDP Calendar**.

> The TPA recommends that Manufacturers submit disputes as soon as they are determined, within the sixty (60) calendar day range, to allow for review of files for correct data inclusion.

> **Note**: Dispute records must pass multiple system verification edits, obtain a status of *Passed* (on the Dispute Submission tab), and appear in the *Number Accepted* (on the Disputes tab), prior to final submission to CMS for review.

D. <u>Invoice Distribution</u> field displays the date the TPA loads the invoices to the Portal.
E. <u>Dispute Distribution</u> field displays the last date TPA/CMS will respond to disputes filed for the quarter. The <u>Dispute Distribution</u> date, also known as the "*Dispute Resolution Deadline*" on the **[CGDP Calendar](#)**, is sixty (60) calendar days after the <u>Dispute Submission</u> date.

PDE Line Item Region
The **PDE Line Item region** contains nine (9) columns that display the PDE line items selected and added to the dispute file from the **Selection Criteria Form**.

The first four (4) columns, fields labeled A through D, provide a user with the ability to review the PDE line item record information according to these fields.

A. <u>P Number</u> column displays the P number assigned to the specific PDE line item.
B. <u>Detail Ref #</u> column provides the detail reference number associated with the specific PDE line item. The <u>Detail Ref #</u> is a unique reference number for the current coverage gap discount and used to track changes in the coverage gap discount record from quarter to quarter.
C. <u>Product Service ID</u> column displays the product service ID assigned to the specific PDE line item.
D. <u>Prescription Service Ref #</u> column displays the unique reference number for a prescription assigned by a plan. It must be unique for any DOS and <u>Service Provider ID</u> combination.

The final five (5) columns, fields labeled E through I, provide a user with the ability to review the PDE line item record information according to these fields.

E. <u>Fill #</u> column displays the total number of retail prescriptions filled at a pharmacy with a two (2)-digit value.
F. <u>Days' Supply</u> column displays the number of days prescriptions supplied and covered by the Sponsor for the specific PDE line item with a three (3)-digit value.
G. <u>Qty Dispensed</u> column displays the quantity (Qty) of the prescription dispensed and covered by the Sponsor for the specific PDE line item.
H. <u>Date of Service</u> column displays the date of service for the specific PDE line item in YYYY-MM-DD format.
I. <u>Gap Discount Amount</u> column displays the dollar amount of the specific PDE line item.

Dispute Builder Save Button

The *Save* **button** allows a user to save the current data in the **PDE Line Item region**.

Dispute Builder Delete All Button

The *Delete All* **button** allows a user to delete all invoice line items added in the **PDE Line Item region**.

Dispute Builder Complete Dispute File Button

The *Complete Dispute File* **button** allows a user to complete the dispute file and prepare it for submission via the Portal to the TPA for edit checks prior to final submission to CMS for review.

Once a user selects the *Complete Dispute File* **button**, the system redirects them to the **Dispute Submission** tab, which allows a user to submit the dispute file in the Portal and begin the TPA validation process.

The discussion of the **Dispute Submission** tab follows in the next section of this manual.

CGDP Portal Instructions – Dispute Builder

Creating Dispute Files via the Dispute Builder Functionality

Manufacturers are able to utilize the Portal to create and complete disputes of a current quarter's distributed invoice line items using the **Dispute Builder** tab.

This instruction provides direction for submitting disputes via the **Dispute Builder** functionality.

1. Authorized end users will access the Portal to create disputes on the **Dispute Builder** tab. Instructions for logging into the Portal can be located in the ***CGDP Manufacturer Portal Introduction and Login Users Guide*** under ***References*** on the *TPAdministrator.com* website.

2. After successful login, the **Home** tab will appear. Position the cursor over the **Disputes** tab to allow the **Dispute Builder** tab to become visible. Select the **Dispute Builder** tab to create a dispute file.

3. Once the **Dispute Builder** tab displays, select the *Selection Criteria Form* button to add data line items to a dispute file. The *Selection Criteria Form* button, visible as the _Click here to add data line items_ button, appears on the **Dispute Builder** tab.

4. On the **Selection Criteria Form**, populate the selection criteria fields based on the necessary data needed to locate individual or specific line items to add to a dispute file.

This example displays a search related to a specific P number for specific line items corresponding to the search criteria entered into the selection criteria fields.

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5. To add individual PDE line items to a dispute file, populate the check box associated with the specific line item located in the **Disputes Selection Results** region.

	P Number	Prescription Ref #	Product Service ID	Service Provider ID	Days Supply	Qty Dispensed	Date of Service	Gap Discount Amount	Previous Discount Amount	Current Discount Amount
☐	P1__6	00000002___2	0009320__6	1_____6	30	60.0	2015-08-15	$54.60	$0.00	$54.60
☐	P1__6	00000005___7	0009330__6	1_____5	30	60.0	2015-08-15	$155.82	$0.00	$155.82
☐	P1__6	00000006___1	0009320__5	1_____4	30	30.0	2015-08-15	$20.01	$0.00	$20.01
☐	P1__6	00000006___5	0009320__6	1_____0	30	30.0	2015-08-15	$3.76	$0.00	$3.76
☐	P1__6	00000007___7	0017229__0	1_____3	30	15.0	2015-08-15	$0.14	$0.00	$0.14
☐	P1__6	00000008___7	0017229__0	1_____1	30	30.0	2015-08-15	$0.38	$0.00	$0.38
☐	P1__6	00000008___0	0009330__6	1_____1	30	60.0	2015-08-15	$73.65	$0.00	$73.65
☐	P1__6	00000009___7	6854602__6	1_____0	30	30.0	2015-08-15	$263.59	$0.00	$263.59
☑	P1__6	00000010___7	6854602__6	1_____1	30	30.0	2015-08-15	$268.01	$0.00	$268.01
☐	P1__6	00000010___9	0017229__0	1_____1	30	30.0	2015-08-15	$0.45	$0.00	$0.45

Selection Results — Page #1 of 10 (Found 972 line items) — >>>

6. To add a specific dispute reason code to multiple line items during the search process, click on the combo box drop down menu located in the **Dispute Reason for Selected Lines (Optional) region** and select the applicable dispute reason code for the line items.

Dispute Reason for Selected Lines (Optional)

Additional fields display based on the dispute reason code selected. Refer to Appendix D: Manufacturer Dispute Reason Codes and Supporting Data Requirements guide in the Reference section for assistance with completing the required and optional fields displayed with each reason code.

This example displays the **Dispute Reason for Selected Lines (Optional) region** with one (1) of the dispute reason codes populated.

Dispute Reason for Selected Lines (Optional)

D01 - Duplicate Invoice Item

Detail Reference Number: 00000028___9

Additional Information: CGDP Portal Dispute process - optional supporting information entered here for Duplicate Invoice Item reason code.

	P Number	Prescription Ref #	Product Service ID	Service Provider ID	Days Supply	Qty Dispensed	Date of Service	Gap Discount Amount	Previous Discount Amount	Current Discount Amount
☐	P1__6	00000002___2	0009320__6	1_____6	30	60.0	2015-08-15	$54.60	$0.00	$54.60
☐	P1__6	00000005___7	0009330__6	1_____5	30	60.0	2015-08-15	$155.82	$0.00	$155.82
☐	P1__6	00000006___1	0009320__5	1_____4	30	30.0	2015-08-15	$20.01	$0.00	$20.01
☐	P1__6	00000006___5	0009320__6	1_____0	30	30.0	2015-08-15	$3.76	$0.00	$3.76
☐	P1__6	00000007___7	0017229__0	1_____3	30	15.0	2015-08-15	$0.14	$0.00	$0.14
☐	P1__6	00000008___7	0017229__0	1_____1	30	30.0	2015-08-15	$0.38	$0.00	$0.38
☐	P1__6	00000008___0	0009330__6	1_____1	30	60.0	2015-08-15	$73.65	$0.00	$73.65
☐	P1__6	00000009___7	6854602__6	1_____0	30	30.0	2015-08-15	$263.59	$0.00	$263.59
☑	P1__6	00000010___7	6854602__6	1_____1	30	30.0	2015-08-15	$268.01	$0.00	$268.01
☐	P1__6	00000010___9	0017229__0	1_____1	30	30.0	2015-08-15	$0.45	$0.00	$0.45

Selection Results — Page #1 of 10 (Found 972 line items) — >>>

Note: The **Dispute Reason for Selected Lines (Optional) region** is not a required field when completing a search in the **Selection Criteria form**. This field is available to assists Manufacturers with applying the same dispute reason code to multiple line items. However, a Dispute reason code is required for each PDE line item record included in a dispute file.

7. Once all line item check boxes are populated and, if applicable, the **Dispute Reason for Selected Lines (Optional) region** displays the applicable reason code for all selected invoices, select the *Add Selected to Dispute File* button to include all checked line items.

8. A system-generated message will appear after line items successfully populate to the dispute file.

9. After the dispute file contains all applicable line items, select the *Return to Dispute Builder* button.

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10. A system-generated Message from the webpage appears. Select <u>OK</u> to proceed to the Dispute Builder page. Select <u>Cancel</u> to exit message and save your work, then select the <u>Add Selected to Dispute File</u> button to add additional line items.
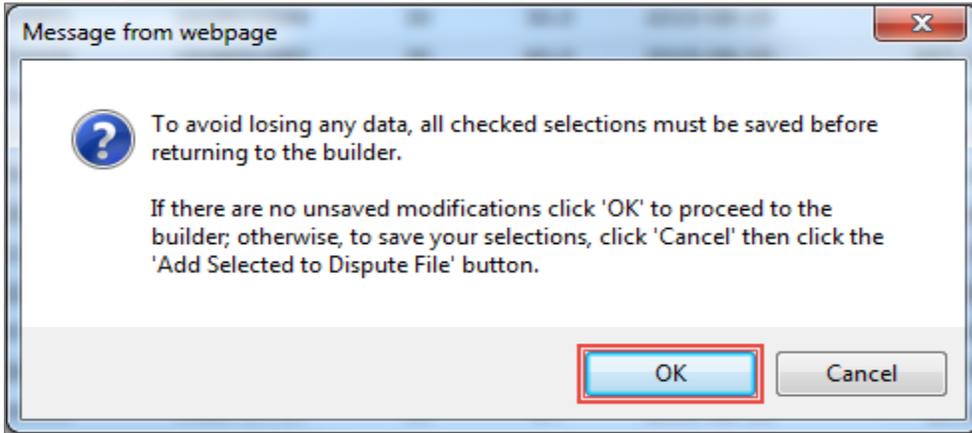
11. The **Dispute Builder** tab displays the included invoice line items.

This example contains multiple line items entered into the file. The example includes line items selected from the **Disputes Search Results region** without populating the dispute reason codes, noted as Incomplete items, and line items selected using the **Dispute Reason for Selected Items (Optional) region**, noted as Valid items.

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12. Incomplete dispute line items require additional information, such as selection of an applicable dispute reason code and the required and or optional reason code supporting information.

> **Note:** All disputed PDE line item records must have a dispute reason code and supporting information, if applicable. Refer to <u>Appendix C: Manufacturer Dispute Reason Codes and Supporting Data Requirements</u> in the Reference section for assistance with selecting the applicable reason code and the required or optional fields displayed with each.

13. To select the applicable dispute reason code for Incomplete line items, select the drop down menu in the <u>Dispute Reason</u> field and select the appropriate reason code for the line item.

14. After selecting the applicable dispute reason code, additional fields will appear based on the required and optional supporting fields associated with the selected dispute reason code.

This example displays the additional fields added to the form based on the dispute reason code selected.

15. After entering the required and optional data into the additional supporting data fields, select the *Save* button to allow the system to verify all required fields contain data as needed.

16. When all fields for a disputed line item contain the required data, the status of the applicable line item updates from Incomplete to Valid.

This example displays a previously Incomplete dispute line item with all required and optional fields completed. The invoice line item now contains a Valid status.

17. Review and verify line items populating the dispute builder. To add additional line items to the dispute file select the *Selection Criteria Form* button and complete the prior steps to add additional line items.

18. To remove an individual line item that should not be included in the dispute file select the *Delete* symbol, located to the right of the <u>Gap Discount Amount</u> column dollar amount, for the line item.

This example displays the location of the *Delete* symbol.

> **Note**: The *Delete* symbol will only be available prior to selecting the *Complete Dispute File* button.

This example displays multiple line items included in a dispute file. This dispute file contains one (1) line item that requires deletion from the file, due to it being included in error.

19. Select the _Delete_ symbol to remove an applicable line item from the dispute file.

20. If **ALL** PDE line items displayed in the **PDE Line Item region** require removal, a user can select the _Delete All_ button, located between the _Save_ button and _Complete Dispute File_ button, to remove all invoice line items from the **PDE Line Item region** and start over.

This example displays the location of the _Delete All_ button used to remove all line items in the **PDE Line Item region**.

Note: The _Delete All_ button will only be available _prior_ to selecting the _Complete Dispute File_ button.

21. After selecting the _Delete All_ button, a system-generated Message from the webpage appears. Select the _OK_ button to proceed with deleting all invoice line items displayed in the **PDE Line Item region**. Select the _Cancel_ button to exit message without deleting any invoice line items.
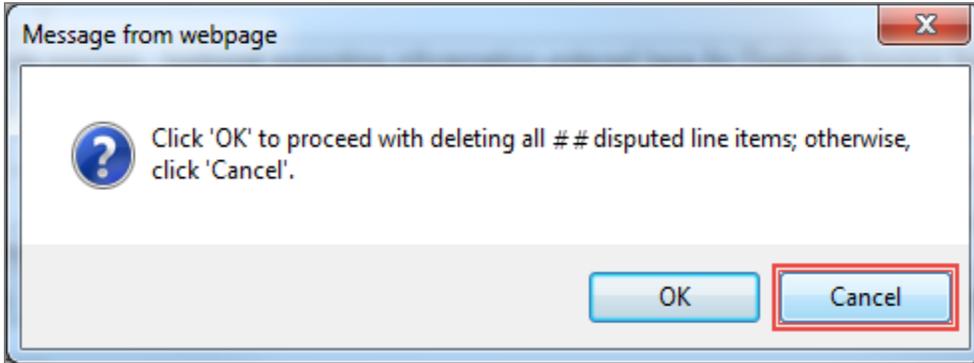
22. If only deleting individual invoice line items, after deleting the incorrect line item from the **PDE Line Item region**, verify the remaining invoice line items are in a Valid status and should be included in the dispute file. If correct, select the _Complete Dispute File_ button.

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23. A system-generated Message from the webpage appears. Select _OK_ to proceed completing the dispute file. Select _Cancel_ to exit message without completing the dispute file.

This example displays the _OK_ button highlighted.

24. The **Dispute Submission** tab displays the newly uploaded dispute file created by the dispute builder. Definition of dispute file submissions appears in the next section, the **Dispute Submission** tab.

You have successfully created and completed a dispute file utilizing the Dispute Builder functionality.

CGDP Portal Dispute Submission Tab

The **Dispute Submission** tab allows Manufacturers to submit dispute files loaded to the Portal by the Dispute Builder functionality, or to upload manually created dispute files from data files received for the current quarter. The **Dispute Submission** tab also allows users to review statuses for both submitted Dispute Builder created files and uploaded dispute files.

This new functionality will assist a user in the ability to verify and review status updates of loaded dispute files. Dispute files undergo system verification via the TPA edit programs to provide CMS with system file edit approved disputes.

> **Note:** Obtaining a *Passed* status for the system verification edits <u>does not</u> mean that the disputed line item records have been upheld by CMS. The *Passed* status for system verification edits means that the dispute file contains the required information to allow CMS to evaluate the dispute request and provide a determination on upholding or denying the dispute.

The **Dispute Submission** tab contains four (4) regions.

1. **Tabbed region** displays the tabbed page that is currently active and displays tabs available for selection.
2. **Upload Dispute File region** allows a user to search for manually created dispute files and load them to the Portal.
3. **Current Cutoff Calendar region** displays specific quarter cutoff dates in a MM/DD/YYYY for the most recent quarter. The current quarter date displays in the title bar of the region, in parentheses, displayed in YYYYQQ format.
4. **Submitted Disputes region** displays dispute files loaded to the Portal and provides status updates to a user.
   > **Note**: The **Dispute Submission** tab displays data associated with the current dispute submission period only. Each quarter, all prior submitted dispute data displayed on the **Dispute Submission** tab is removed.

The upcoming pages will describe each region and its associated functions.

Tabbed Region – Dispute Submission

The **Tabbed region** allows a user to select different activities to perform while accessing the system. In this example, the **Dispute Submission** tab is active.

Upload Dispute File Region

The **Upload Dispute File region** on the **Dispute Submission** tab contains two (2) fields to assist a user with locating manual dispute files and uploading them to the Portal.
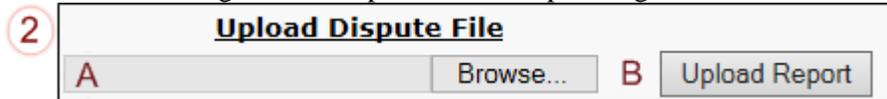
- A. *Browse…* field allows a user to search their local computer to locate manually created dispute files and select the file to be uploaded to the Portal.
- B. *Upload Report* button allows a user to upload the manual dispute file, selected and entered in the Browse field, to the Portal for TPA validation edits and eventual submission to CMS for evaluation and determination.

Current Cutoff Calendar Region

The **Current Cutoff Calendar region** displays important program cutoff dates for the current quarter.

The calendar region contains five (5) fields to keep users aware of specific due dates for the current quarter.

- A. Current Cutoff Calendar (Quarter YYYYQQ) field displays the current quarter in an YYYYQQ format.
- B. Invoice Paid By field displays the due date Manufacturers have to pay amounts invoiced to each contract, known as the *"Invoice Paid By 38th Calendar Day After Receipt"* as listed on the **CGDP Calendar**. Invoice payments are due to be paid by the Manufacturer within but not over 38 calendar days after the *"Quarterly Invoice Receipt Date"*, which is the next calendar day after the *"Quarterly Invoice Distribution"* date on the **CGDP Calendar**.

    Note: TPA recommends that invoices are paid prior to the payment due date or the *"Invoice Paid By 38th Calendar Day After Receipt" date*, not on the due date. Initiating payment prior to the due date will allow for error-free processing of Portal-initiated ACH payments.

    Payments that error out on the due date are not considered as initiated and could be subject to civil monetary penalties assessed by CMS as per the Manufacturer agreement.

C. Dispute Submission field displays the last date Manufacturers can submit disputes for the quarter. The Dispute Submission date is 60 calendar days after the Invoice Receipt Date. TPA recommends that Manufacturers submit disputes as soon as they are determined, within the 60-calendar day range, to allow for review of files for correct data inclusion.

> **Note**: Dispute records must pass multiple system verification edits, obtain a status of *Passed* (on the **Dispute Submission** tab), and appear in the *Number Accepted* (on the **Disputes** tab), prior to final submission to CMS for review.

D. Invoice Distribution field displays the date the TPA loads the invoices to the Portal.

E. Dispute Distribution field displays the last date TPA/CMS will respond to disputes filed for the quarter. The Dispute Distribution date, also known as the "*Dispute Resolution Deadline*" on the **CGDP Calendar**, is sixty (60) calendar days after the Dispute Submission date.

Submitted Disputes Region

The **Submitted Disputes region** on the **Dispute Submission** tab displays loaded dispute files that were loaded to the Portal, either as an *Uploaded* file or as a *Generated by Builder* file.

This region contains seven (7) columns that provide a user with the ability to review the loaded dispute files according to these fields.

	A	B Download	C Date Created	D Date Submitted	E Status	F Date Returned	G
4	201503P1__6-19 (Generated by Builder)	○	2016-01-25	N/A	N/A	N/A	Submit
	201503P1__6-16 (Generated by Builder)	○	2016-01-22	N/A	N/A	N/A	Submit

A. Dispute File Name column displays the system generated file number for each dispute file loaded to the Portal. System generated numbers contain the current quarter information in YYYYQQ format followed by the P number then a sequential number assigned by the system.

B. Download column displays a radio button that provides a user with the ability to download and review specific dispute files loaded to the Portal via the **Dispute Builder** functionality.

> **Note:** Manually created and uploaded files are not downloadable from the **Dispute Submission** tab. The Download field displays an N/A.

C. Date Created column displays the creation date of the dispute file entered into the Portal via the Dispute Submission tab. Displayed in YYYY-MM-DD format.

D. Date Submitted column displays the submission date of the dispute file to the Portal in an YYYY-MM-DD format.

- The Date Created and Date Submitted field's content will be the same for manually created and uploaded files.
- The Date Created and the Date Submitted field content may be different for dispute files generated by the **Dispute Builder** functionality, depending on if the files are completed but not submitted on the same day.

E. Status column provides a user with a valid status of dispute files. Available statuses are:

- A *Delayed* status alerts a user that a subsequent Dispute Builder or manually uploaded file for the same P number, submitted in the same 24-hour processing period, will be processed in the subsequent processing period.
- A *Failed* status alerts a user that a manually uploaded dispute file has not passed TPA initial edits and requires additional review and correction prior to being eligible for secondary validation and submission to CMS.

- A *Passed* status alerts a user that the dispute file passed TPA final validation edits and the file is eligible for submission to CMS for secondary validation edit and review.
- A *Validation Pending* status alerts a user that the file passed initial TPA edits and requires TPA final validation edits prior to update of the status to *Passed* or *Failed*.

F. Date Returned column displays the date the status of *Passed* or *Failed* assigned to the individual record in YYYY-MM-DD format.

G. *Submit* button displays when a dispute file has been loaded to the Portal and allows a user to submit the file for validation by TPA prior to submission to CMS for review and determination.

> **Note**: A file must be in a *Passed* status to be submitted to CMS for review and determination.

> *Delayed* files will receive a Delayed Dispute Submission message and will be processed in the subsequent 24-hour processing cycle. If more than one file receives a *Delayed* status, each file will process 24-hours after its predecessor file completes processing.

> For manually uploaded dispute files only:
> If some PDE line item records in an uploaded dispute file do not pass validation edits, the whole file will receive a *Failed* status.
> - For example, a manually uploaded dispute file contains five (5) PDE line item records. Four line item records pass the validation edits. The fifth line item record does not. The entire uploaded dispute file receives a *Failed* status.

CGDP Portal Instructions – Dispute Submission

Submitting Dispute Builder Dispute Files

Manufacturers are able to utilize the Portal to submit disputes of distributed invoice line items created using the **Dispute Builder** functionality. The **Dispute Submission** tab allows Manufacturers to submit dispute files loaded by the **Dispute Builder** functionality and review the status of those dispute files as they progress through the dispute validation process.

> **Note**: TPA recommends that submission of dispute files occur as soon as Manufacturers identify dispute-eligible invoice line items and not wait until the *"Dispute Submission Deadline"*, which is sixty (60) days after the *"Quarterly Invoice Receipt Date"* as listed on the **_CGDP Calendar_**.

A dispute file must be in a *Passed* status to be submitted to CMS for review and determination.

Delayed files will receive a Delayed Dispute Submission message and will be processed in the subsequent 24-hour processing cycle. If more than one file receives a *Delayed* status, each file will process 24-hours after its predecessor file completes processing.

A dispute file must receive both a *Passed* status on the **Dispute Submission tab** and the dispute records must appear in the *Number Accepted* field on the **Dispute tab Return Reports region** before the files are eligible for CMS evaluation and determination.

This instruction provides direction on submitting **Dispute Builder** dispute files and reviewing file submission error reports in the **Dispute Submission** tab

1. Authorized end users will access the Portal to submit **Dispute Builder** disputes on the **Dispute Submission** tab. Instructions for logging into the Portal can be located in the ___CGDP Manufacturer Portal Introduction and Login Users Guide___ under **References** on the _TPAdministrator.com_ website.

2. After successful login, the **Home** tab will appear. Position the cursor over the **Disputes** tab to allow the **Dispute Submission** tab to become visible. Select the **Dispute Submission** tab to review and submit a Builder-created dispute file.

3. Once the **Dispute Submission** tab displays, review the **Submitted Disputes region** for files requiring attention.

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4. Select a dispute file created via the **Dispute Builder** functionality that remains available for submission. **Dispute Builder** files contain a system generated naming convention for the Dispute File Name consisting of the current quarter information in YYYYQQ format followed by the P number then a sequential number assigned by the system. The file also displays information regarding how a file loaded to the **Submitted Disputes region**.

    For files created using the **Dispute Builder** functionality the designation of *(Generated by Builder)* displays below the dispute file report naming convention. Dispute files that are available for submission display the *Submit* button.

This example displays a dispute file with the *(Generated by Builder)* designation and *Submit* button highlighted.

5. To review a specific **Dispute Builder** file, populate the corresponding Download radio button for the applicable dispute file.

6. Select one (1) of the decision buttons in the message that appears at the bottom of the screen.
    - *Open* to view the data in text file format
    - *Save* to save the dispute file in text file format to a user's hard drive or system
    - *Cancel* to exit the decision message

This example displays the selected *Open* button.

7. Review the downloaded text file of a **Dispute Builder** created dispute file to verify all invoice line items.

It is recommend that Manufacturers save **Dispute Builder** created dispute text files to their systems for future access and reference, since removal of prior quarter data occurs once new quarter data is loaded to the Portal.
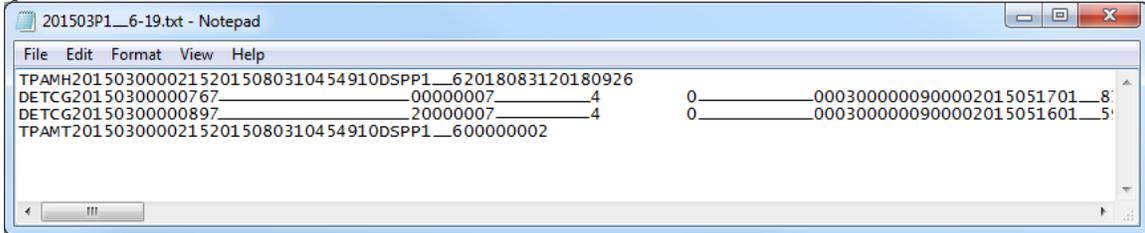
8. Once a user reviews the **Dispute Builder** dispute file, the file is eligible for submission.

9. To submit a **Dispute Builder** dispute file, select the *Submit* button for the applicable file.

10. Upon submission of a created **Dispute Builder** file, the <u>Date Submitted</u> column populates with the file submission date and the <u>Status</u> column updates to *Validation Pending*.
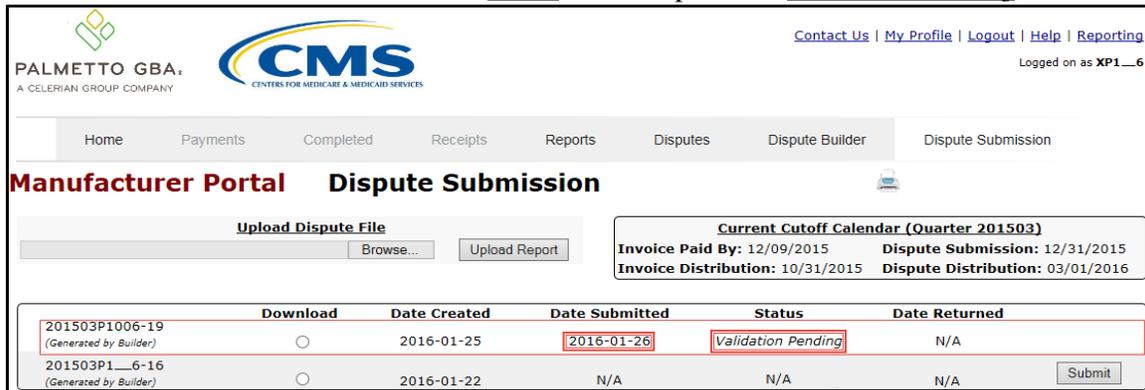
11. TPA performs final validation edits of dispute files with the status of *Validation Pending* to verify that files contain data in required fields and confirm validity to proceed to the secondary validation process.
    - Dispute files that are duplicates of submitted files for the same P number in the same 24-hour processing period (4:00 pm – 4:00 pm ET) will receive a *Delayed* status in the Status column.
    - Dispute files that pass TPA final edits receive a status of *Passed*.
    Note: The **Dispute Submission** process will only allow and assign only one (1) *Passed* status to one (1) dispute file for each P number associated with a Corporate ID in a 24-hour processing cycle (4:00 pm – 4:00 PM ET).

        Example:
        A user creates a dispute file using the **Dispute Builder** functionality and submits the file on the **Dispute Submission** tab; then realizes that additional invoice line items are not included in the dispute file. An additional dispute file is created for same P number and submitted in the same 24-hour processing period as the first dispute file. When TPA validation edits process and the first dispute file receives a *Passed* status, any other files submitted the same 24-hour processing cycle with the same P number will receive a *Delayed* status due to duplicate file submission.

    Dispute files that receive the *Delayed* statues will be processed in the subsequent 24-hour processing cycle. If more than one file receives a *Delayed* status, each file will process 24 hours ager its predecessor file completes processing.

12. This example displays a dispute file created and completed by the **Dispute Builder** functionality displaying the Status of *Delayed* after TPA final edit process completes.

    Note: the Date Submitted column for the displayed files is the same. The second file received for the same business day receives a *Delayed* status because it is a duplicate file for the same P number.

13. The system automatically generates a system message regarding the _Delayed_ file.

This example displays the <u>Delayed Dispute Submission</u> message associated with a dispute file with a _Delayed_ status.
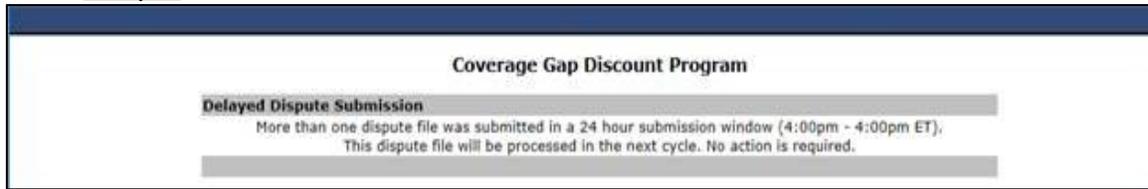
14. This example displays a dispute file created and completed by the **Dispute Builder** functionality with the updated status of _Passed_ after TPA final edit process completes.
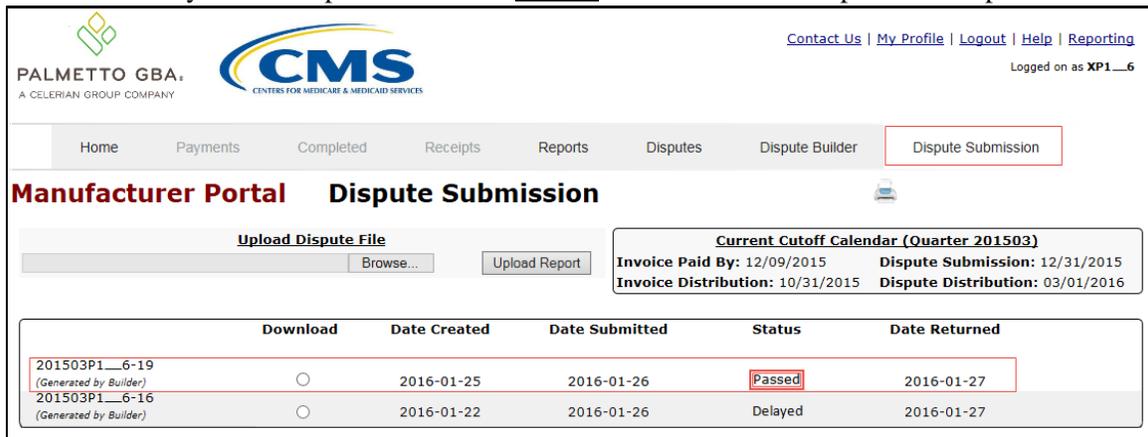
15. After a dispute file receives a _Passed_ status, the secondary validation edits process runs overnight. Dispute secondary validation edits create Return reports, available the next business day that provide _Accepted_ and _Rejected_ invoice line items for a specific dispute file.

Refer to the instruction for **Accessing Disputes Return and Resolution files** for instruction on viewing dispute return reports.

You have successfully completed submitting a **Dispute Builder** created dispute file utilizing the **Dispute Submission** tab.

Submitting Manual Dispute Files

Manufacturers are able to utilize the Portal to submit manually uploaded dispute files containing distributed invoice line items. The **Dispute Submission** tab allows Manufacturers to upload these dispute files and review their status as they progress through the dispute validation process.

> **Note**: TPA recommends that submission of dispute files occur as soon as Manufacturers identify dispute-eligible invoice line items and not wait until the *"Dispute Submission Deadline"*, which is sixty (60) days after the *"Quarterly Invoice Receipt Date"* as listed on the **_CGDP Calendar_**.

A dispute file must be in a _Passed_ status to be submitted to CMS for review and determination.

Delayed files will receive a Delayed Dispute Submission message and will be processed in the subsequent 24-hour processing cycle. If more than one file receives a _Delayed_ status, each file will process 24-hours after its predecessor file completes processing.

If some PDE line item records in a manually uploaded dispute file do not pass validation edits, the whole file will receive a _Failed_ status.

> For example, a manually uploaded dispute file contains five PDE line item records. Four line item records pass the validation edits. The fifth line item record does not. The entire uploaded dispute file receives a _Failed_ status.

Failed records must be corrected or removed from the file and resubmitted. The dispute file must receive both a _Passed_ status on the **Dispute Submission tab** and the dispute records must appear in the _Number Accepted_ field the **Dispute tab Return Reports region** before they are eligible for CMS review and analysis.

A dispute file must receive both a _Passed_ status on the **Dispute Submission tab** and the dispute records must appear in the _Number Accepted_ field on the **Dispute tab Return Reports region** before the files are eligible for CMS evaluation and determination.

This instruction provides direction on creating a manually uploaded dispute file and reviewing file submission error reports in the **Dispute Submission** tab.

Instructions for creating a manual dispute file are available using the Manual Dispute Submission and Attachment Overview document located under **Manufacturer Disputes** on the_TPAdministrator.com_ website.

1. Authorized end users will access the Portal to load manual disputes to the **Dispute Submission** tab. Instructions for logging into the Portal can be located in the ***CGDP Manufacturer Portal Introduction and Login Users Guide*** under **References** on the TPAdministrator.com website.

2. After successful login, the **Home** tab will appear. Position the cursor over the **Disputes** tab to allow the **Dispute Submission** tab to become visible. Select the **Dispute Submission** tab to submit a manually uploaded dispute file.

3. Once the **Dispute Submission** tab displays, select the *Browse...*button in the Upload Dispute File region.

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4. Search and select the dispute file to upload to the **Upload Dispute File region** and select the _Open_ button.

This graphic provides an example of a search for a manual dispute text file saved to a user's computer.
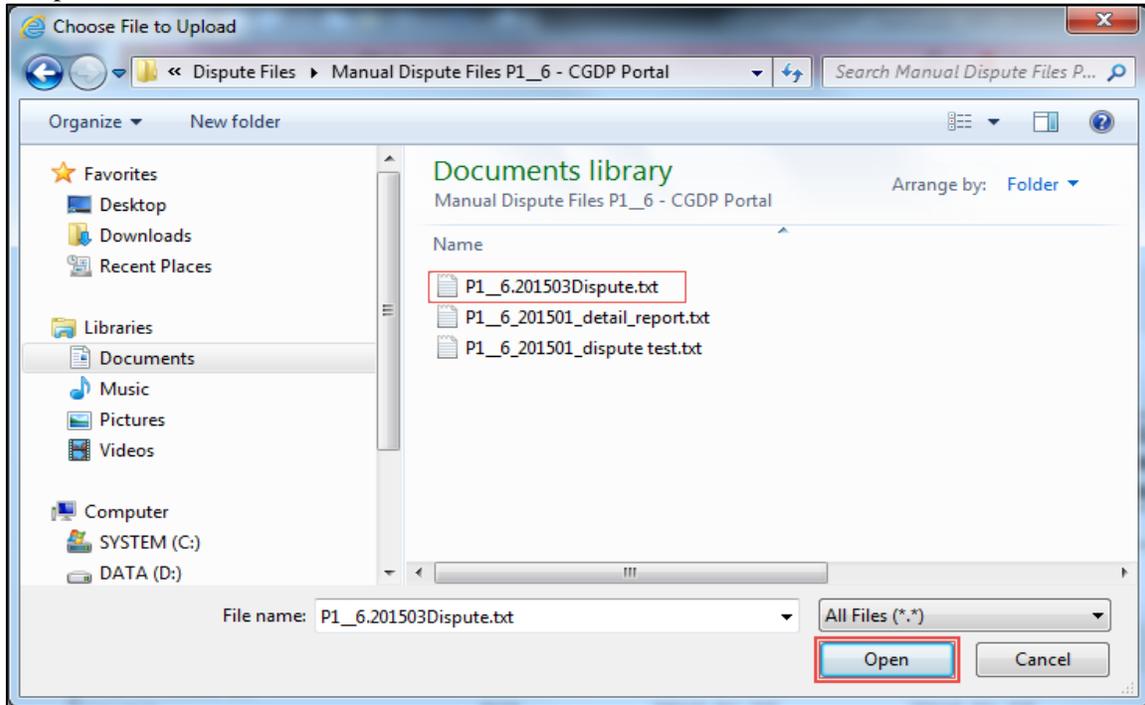
> **Note**: Information for creating a manual dispute text files can be located in the _Manual Dispute Submission and Attachment Overview_ located under **Manufacturer Disputes** on the_TPAdministrator.com_ website.

5. After the selected dispute file populates in the field to the left of the _Browse…_ button, select the _Upload Report_ button to load the dispute file to the Portal.
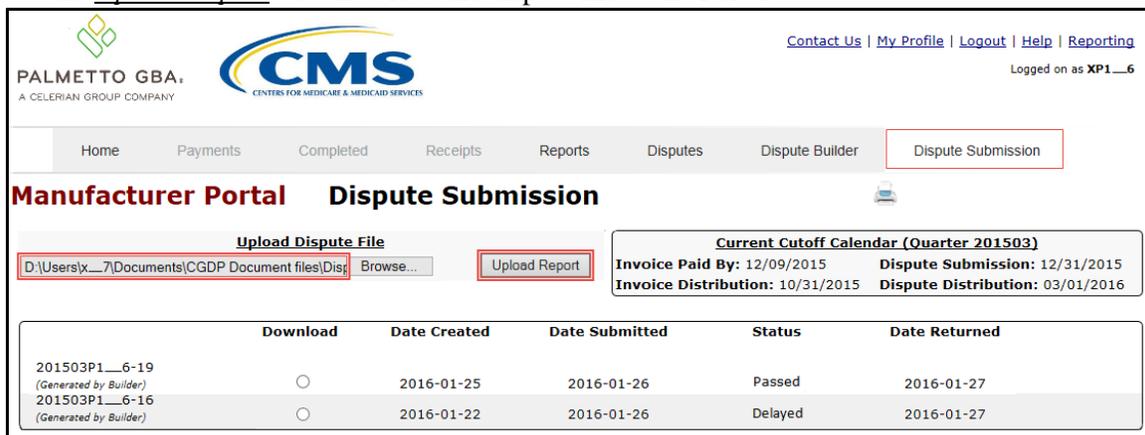
6. Uploaded dispute files display a system generated naming convention for the <u>Dispute File Name</u> consisting of the current quarter information in YYYYQQ format followed by the P number then a sequential number assigned by the system. The file also displays information regarding how a file loaded to the **Submitted Disputes region**.

For manually uploaded dispute files, the designation of *(Uploaded)* displays below the dispute file report naming convention.

This example displays a dispute file with the *(Uploaded)* designation and a <u>Status</u> of *Validation Pending*.

7. When the selected dispute file loads to the **Dispute Submission** tab, the file goes through validations that verify:
   - Dispute file formatting, such as the required header and trailer records, line item spacing, etc.
   - Completion of dispute reason code required data such as required supporting information, formatting of dates, etc.

One of four (4) statuses will populate the <u>Status</u> column in the **Submitted Disputes region** for uploaded dispute files immediately after upload into the **Dispute Submission** tab.
   - *Delayed* status alerts a user that a subsequent Dispute Builder or manually uploaded file for the same P number, submitted in the same 24-hour processing period, will be processed in the subsequent processing period.
   - *Failed* status alerts a user that a manually uploaded dispute file has not passed TPA initial edits and requires additional review and correction prior to being eligible for secondary validation and submission to CMS..
   - *Passed* status alerts a user that the dispute file passed TPA final validation edits and the file is eligible for submission to CMS for secondary validation edit and review.
   - *Validation Pending* status posted to uploaded dispute files that passed the initial validation edits.

8. This example displays a dispute file with the *(Uploaded)* designation and a Status of *Failed*.

9. To review failed dispute file errors, select the *Failed* status hyper link located in the Status column in the **Submitted Disputes region**.

This example displays the Dispute File Validation Errors form associated with a dispute file with a Status of *Failed*.

10. Once review and correction of *Failed* Dispute File Validation Errors occurs, upload the corrected dispute file to the **Dispute Submission** tab.

This example displays the dispute file uploaded to the **Dispute Submission** tab after correction of errors and displays a Status of *Validation Pending*.

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11. TPA performs validation edits of dispute files with the status of *Validation Pending* to verify that files contain data in required fields and confirm validity to proceed to the secondary validation process.

- Dispute files that pass TPA final edits receive a status of *Passed* status.
- Dispute files that are duplicates of submitted files for the same P number in the same 24-hour processing period (4:00 pm – 4:00 pm ET) will receive a status of *Delayed.*
- Dispute files that do not pass TPA edits receive a status of *Failed,* require additional review, and update prior to resubmitting the file.

Note: The **Dispute Submission** process will allow and assign only one (1) *Passed* status to one (1) dispute file for each P number associated with a Corporate ID each business day.

Example:
A user creates a manual dispute text file and submits the file on the **Dispute Submission** tab; then realizes that additional invoice line items are not included in the dispute file. An additional dispute file for same P number is created, uploaded, and submitted in the same 24-hour processing period as the first dispute file. When the TPA validation edits process and the first submitted file receives a *Passed* status, any other files submitted the same 24-hour processing cycle with the same P number will receive a *Delayed* status due to duplicate file submission.

Dispute files that receive the *Delayed* statues will be processed in the subsequent 24-hour processing cycle. If more than one file receives a *Delayed* status, each file will process 24 hours after its predecessor file completes processing.

12. This example displays the previously *Failed* dispute file that has been corrected and uploaded again. The *Status* column displays *Delayed* after TPA edit process completes.

13. The system automatically generates a system message regarding the *Delayed* file.

This example displays the Delayed Dispute Submission message associated with a dispute file with a *Delayed* status.

14. This example displays the previously *Delayed* dispute file. The *Status* column displays *Passed* after TPA edit process completes.

Note: The *Delayed* uploaded dispute file processed during the subsequent 24-hour processing cycle (4:00 pm – 4:00 pm ET). The Date Returned column displays the next cycle date.

15. After a dispute file receives a *Passed* status, the secondary validation edits process runs overnight. Dispute secondary validation edits create Return reports, available the next business day that provide the *Accepted* and *Rejected* invoice line items for a specific dispute file.

   Refer to the instruction for **Accessing Disputes Return and Resolution files** for instruction on viewing dispute return reports.

You have successfully completed submitting a manual dispute text file utilizing the **Dispute Submission** tab.

Summary

This Manufacturer Users Guide provided an overview of the CGDP Portal's **Disputes** functionality.

Disputed PDE line item records included in a dispute record file *must* be paid by the invoice payment deadline, also known as the "*Invoice Paid By 38th Calendar Day After Receipt*" as defined in the ***CGDP Calendar***, even if the invoiced item is being disputed.

This guide introduced how the **Dispute Dashboard** lists return and resolution reports received by the TPA. Return reports are loaded to the Portal in response to dispute files submitted by Manufacturers. Resolution reports are determinations on accepted dispute files provided by CMS.

You have been introduced to how Manufacturers are able to create dispute record files for disputed PDE line item records by using the information provided in the current quarter's Data report. Manufacturers have two (2) options for to creating dispute record files: manually in a text file format, or utilizing the Portal's Dispute Builder functionality.

Finally, both manual dispute text files and Dispute Builder-created files are submitted via the CGDP Portal.

> **Note**: Report formats are located under ***Manufacturer Disputes*** on the *TPAdministrator.com* website to assist with reading the text file formats of the Manufacturer Dispute file.

References

Appendix A: Acronym List

Acronym	Description
ACH	Automated Clearing House
BY	Benefit Year
CGDP	Coverage Gap Discount Program
CMS	Centers for Medicare & Medicaid Services
CY	Calendar Year
DPP	Direct Payment Process
EFT	Electronic Funds Transfer
EIN	Employer Identification Number
GBA	Government Benefits Administrators
HPMS	Health Plan Management System
ID	Identifier or Identification
IRS	Internal Revenue Service
NCPDP	National Council of Prescription Drug Programs
NDC	National Drug Coder
NPI	National Provider Identifier
NSF	Non-sufficient Funds
PIN	Personal Identification Number
PDE	Prescription Drug Event
SFTP	Secure File Transfer Protocol
SSA	Social Security Act
TPA	Third Party Administrators
TIN	Tax Identification Number
UPIN	Unique Physician Identification Number
USD	United States Dollar

Appendix B: Error Message Descriptions

Error Descriptions	Process
Batch File Errors	
File rejected: File must start with a header record	Batch
File rejected: Invalid Header record	Batch
File rejected: Each header record must contain 'HDR', Primary ID and Reporting period	Batch
File Rejected: Invalid Reporting Period	Batch
Header row without details	Batch
Partially Rejected	Batch
Totally Rejected	Batch
File Rejected: Improperly Formatted	Batch
Primary Id and logon do not match	Batch
Line item not found.	Batch
Batch Initiation Failure	Batch
Batch Defer Failure	Batch
Initiation Failure Errors	
Debit Failed Due to Closed/Invalid Account	Initiation: Bank Error
Debit Failed Due to Insufficient Funds	Initiation: Bank Error
Debit Failed Due to Suspended Account	Initiation: Bank Error
Debit Failed Due to Charged Back Account	Initiation: Bank Error
Debit Failed Due to Resolved Account	Initiation: Bank Error
Debit Failed Due to Debit Block	Initiation: Bank Error
Scheduled payment date before invoice distribution date	Initiation
Other UNKNOWN ERROR	Initiation
Invalid Bank Account	Initiation
Invalid CARE Account	Initiation
Initiation Failure	Initiation
Post-Initiation Failure Errors	
Credit Failed Due to Closed/Invalid Account	Post-Initiation
Credit Failed Due to Charged Back Account	Post-Initiation
Reporting Failure Errors	
Unknown failure	Reporting
Line item has been already processed	Reporting
Single amount exception velocity amount	Reporting
Terminal disabled	Reporting
Other UNKNOWN ERROR	Reporting
Your request cannot be processed, Please revise your data and retry	Reporting
Declined	Reporting
Processing System Error	Reporting
Failed - Closed / Invalid Acct	Reporting
Failed - Non-Sufficient funds	Reporting
Failed - Charged Back	Reporting
Failed - Resolved	Reporting
Invalid Routing Number	Reporting
Terminal disabled	Reporting

Appendix C: Manufacturer Dispute Reason Codes and Supporting Data Requirements

Dispute Reason Code	Dispute Reason Description	Supporting Detail Reference Number	Supporting Date 1	Supporting Date 2	Additional Information (Optional/ Required)
D01	Duplicate Invoice Item	Reference Number			Provide additional supporting evidence (Optional)
D02	Closed Pharmacy		NCPDP closed date		Provide additional supporting evidence (Optional)
D03	Not PART D Covered Drug				Explain statutory exclusion that applies to this drug (Required)
D04	Excessive Quantity				Excessive quantity on individual invoice item. Provide proprietary benchmark used to identify excessive quantity (Required)
D05	Invalid Days Supply *REASON CODE DISABLED 2/8/2015*				Provide additional supporting information (Required)
D06	High Price of the Drug				Provide additional supporting information (Required)
D07	Last Lot Expiration Date		NDC directory drop date	Last lot expiration date	Provide additional supporting information (Optional)
D08	Early Fill *REASON CODE DISABLED 2/8/2015*	Reference Number for early fill disputed			Provide additional supporting information (Required)
D09	Marketing Category is not NDA or BLA		FDA update date		Provide additional supporting information (Optional)

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Dispute Reason Code	Dispute Reason Description	Supporting Detail Reference Number	Supporting Date 1	Supporting Date 2	Additional Information (Optional/ Required)
D10	Date of Service prior to 01/01/2011 *REASON CODE DISABLED 2/8/2015*				Provide additional supporting information (Optional)
D11	PDE improperly invoiced beyond Manufacturer agreement invoice period				Provide additional supporting information (Optional)
D12	Invalid Prescription Service Reference Number *REASON CODE DISABLED 2/8/2015*				Provide additional supporting information (Optional)
D13	Gap discount for disputed PDE exceeds maximum discount amount for a single PDE				Provide additional supporting information (Required)
D14	Total accumulated gap discounts reported across multiple PDEs for a single beneficiary exceed cumulative maximum discount amount				Provide additional supporting information (Required)
D99	Other				Provide additional supporting information (Required)

Glossary

Term	Definition
Authorization Amount	Displays the amount authorized for payment processing, including amounts located in the <u>Invoice Amount</u> and <u>Previous Deferred Amount</u> fields.
Available	Status designation of an invoice that denotes that an item is ready for payment initiation.
Batch	Report type that displays batch files uploaded to the system with status and ability to download files for review.
Batch ID	Displays the batch numbering convention, system generated, based on the order the batch file received by the system.
Contact Us	Provides contact information for requesting assistance from the TPA Operations team.
Contract Number	Pending contract number assigned by CMS which allows participation in the Coverage Gap Discount Program
Corporate ID	Numerical designation assigned by CMS to Manufacturers. For Manufacturers, the current Mailbox ID will be the Corporate ID.
Data	Report type that displays the detail information of distributed invoices and invoice line items and provides the ability to download files for review.
Date Loaded	Displays the invoice distribution date. This date corresponds to the end of month after the reporting period closing. Date format is DD/MM/YYYY.
Date Submitted	Displays the calendar date, in MM/DD/YYYY format, the invoice line item was processed for payment initiation.
Date Time	Displays the batch file date and time for files loaded to the system. Date format is MM/DD/YYYY. Time format is HH:MM AM/PM.
Defer	Provides a check box available for selection when the Invoiced Amount or the combination of the <u>Invoiced Amount</u> and the <u>Previous Deferred Amount</u> total less than the system-defaulted allowable amount. Invoice line items can only be deferred if the Manufacturer or Sponsors banking ACH process prevents payment of invoice line items that fall below the minimum ACH processing amount.
Deferred	Status designation of an invoice that denotes that invoice amount falls below minimum. Invoice line items can only be deferred if the Manufacturer or Sponsors banking ACH process prevents payment of invoice line items that fall below the minimum ACH processing amount.
Description (Batch)	Displays the batch file name loaded to the system.
Dispute	Report type that provides the ability to enter dispute requests and review the status of entered requests.
Dispute Distribution	Current Cutoff Calendar field that displays the current reporting period data. Displays the date Dispute distributions are due to be loaded to the Portal.
Dispute Submission	Current Cutoff Calendar field that displays the current reporting period data. Displays the date Dispute submissions are due to be entered into the Portal.
Download	Displays a radio button to allow downloading of distributed invoice summary information loaded to the system.
EFTID	Displays EFT identifying information in the specified format of CG for Coverage Gap; YYQQ for the reporting period; 9999 for the P number and Z9999 for the contract number. Example: CG14039999Z9999.

Term	Definition
Failed (Status)	Status designation of an invoice that denotes that one (1) or more items have an unsuccessful payment attempt.
Failed (Code)	Provides an informational message when an invoice line item does not successfully process payments to Manufacturers or Sponsors.
Help	Provides link to reference guides and system code messages and descriptions.
Incomplete	Status designation of an invoice that denotes that one (1) or more items have not been paid.
Initiate Payment	Provides a check box to allow the payment process to begin for an individual invoice line item.
Invoice	Report type that displays the summary information of distributed invoices and provides the ability to download files for review.
Invoice Distribution	Current Cutoff Calendar field that displays the current reporting period data. Displays the date distributed invoices were posted to the Portal.
Invoice Paid by	Current Cutoff Calendar field that displays the current reporting period data. Displays the final due date all invoice line items are to be processed for payment.
Invoiced Amount	Displays the invoice line item amounts due to either the Manufacturer or Sponsor.
Invoiced Reporting Period	Region of the active tab that provides the reporting period of the invoice line items displayed.
Last Download	Displays the last date and time distributed invoice summary data retrieved from the Web Portal. Date format is MM/DD/YYYY. Time format is HH:MM. AM/PM
Logout	Provides one (1)-click access for logging out of the system.
Manufacturer	Any entity which is engaged in the production, preparation, propagation, compounding, conversion or processing of prescription drug products, either directly or indirectly, by extraction from substances of natural origin or independently by means of chemical synthesis or by a combination of extraction and chemical synthesis. Such term does not include wholesale distributors or retail pharmacies licensed under State law. *From Medicare Coverage Gap Discount Program Agreement, item I.j.*
My Profile	Provides ability to enter and review business contact information for Manufacturers and Sponsors.
Outstanding	Status designation of an invoice that denotes no payment activity has taken place
P Number	Pending contract number assigned by CMS which allows participation in the Coverage Gap Discount Program
Parent Org. ID	Numerical designation assigned by CMS to Sponsor.
Payment Date	Displays current date of a generated invoice line item payment in MM/DD/YYYY format.
Payments Due	Region of the active tab that provides the final date invoice line item payment initiations due to complete initiation.
Payment/Failed Date	Displays the date a specific invoice line item payment initiation successfully processed or where payment initiation failed the payment initiation process.
Pending	Status designation of an invoice that denotes that all line items have been initiated successfully.

Term	Definition
Previous Deferred Amount	Displays amounts that qualified for deferment from the prior reporting period(s).
Received	Status designation of an invoice that denotes payment is in the applicable bank account
Reporting Period	Quarter and Calendar year, in YYYYQQ format, prescription drug event data distributed to Manufacturers and Sponsors. CY Closeout reimbursement period, in YYYY format, for quarter 17 upheld disputes not offset in prior quarter invoice distributions.
Sponsor	A Part D Plan (PDP) Sponsor, Medicare Advantage (MA) organization offering a MA-prescription drug (PD) plan, a Program of All-Inclusive Care for the Elderly (PACE) organization offering a PACE plan including qualified prescription drug coverage and a cost plan offering qualified prescription drug coverage. *From Pub. 100-18: Medicare Prescription Drug Benefit Manual, section 20.*
Status	The current designation of an invoice line item within the system.
Status (Batch)	Displays the condition of the batch file loaded to the system. Batches can be successful, partially successful (containing line failures) or failed.
Stop Payment	Provides a check box with the ability to stop payment processing prior to actual payment for future dated payments.
Successful	Status designation of an invoice that denotes that all line items have been paid successfully.
Total Available	Displays the total dollar amount of remaining invoice line items requiring payment.
Total Deferred	Displays the total dollar amount of deferred invoice line items with amounts less than the allowable amount to the subsequent reporting period.
Total Failed	Displays the total dollar amount of invoice line items selected for payment that contained errors and did not complete the payment process for the reporting period.
Total Invoiced	Displays the total dollar amount of invoice line items that require payment for the reporting period.
Total Outstanding	Displays the total dollar amount of remaining invoice line items requiring processing.
Total Owed	For Manufacturers: Displays the total dollar amount of negative invoice line items due from Sponsors. For Sponsors: Displays the total dollar amount of invoice line items due from Manufacturers
Total Pending	Displays the total dollar amount of invoice line items selected for payment for the reporting period.
Total Received	For Manufacturers: Displays the total dollar amount of negative invoice line items received from Sponsors. For Sponsor: Displays the total dollar amount of invoice line items received from Manufacturers.
Total Successful	Displays the total dollar amount of invoice line items that have successfully paid and are no longer visible in the Payment Initiation or Pending Transaction regions of the Payments tab.

Term	Definition
User ID	Credential information provided by TPA to Manufacturer or Sponsor for access to system. User ID is the Corporate ID, formerly the Mailbox ID for Manufacturer User ID is the Parent Organization ID (Parent Org. ID) for Sponsor

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