Coverage Gap Discount Program (CGDP)
Direct Payment Process (DPP) FAQ

1. **How will DPP support payers' need to have payments initiated by an authorized person that may not be the TPA's primary point of contact?**
   There are accounts with two different roles: One for Administration purposes with no payment initiation capability and another strictly for Payment Initiation purposes. Accounts are created with both roles for the primary contact by default but the Payment Initiation role can be assigned to a different person upon receipt of written authorization.

2. **Will more than one person be able to fill the Administration and Payment Initiation roles?**
   No, there can only be one person filling both roles or one person filling the Administration role and one person filling the Payment Initiation role.

3. **How do I submit Payment Confirmations after the Q2 2015 invoices are released?**
   No more payment confirmation reports will be accepted after August 14, 2015 for any invoicing period. In the new CGDP portal, payment confirmation occurs when the transaction successfully processes.

4. **Which mailboxes and portals will be phased out?**
   Any existing mailboxes and portals used to upload, download, and confirm payments will be phased out. This includes the SFTP mailboxes which are used by Manufacturers. All of the necessary tools to function within the program will be available on the new CGDP Portal. Advance notice will be provided prior to shutting down existing mailboxes and portals.

5. **Where will I find the reports?**
   All current reports such as the summary, data/detail and tracking reports starting with Q1 2015 will continue to be available on the new CGDP Portal in the original formats. Additionally, we have added a readable version of the data/detail report which will be in Microsoft Excel format and will have the over punch characters already translated.

6. **How will Negative amounts be handled with this new process?**
   From the Manufacturer's perspective, all negative amounts will appear on the Receipts tab as amounts due to you from the Sponsor.

7. **Will my bank statement show one, combined amount for all payment made / received or separate entries?**
   It has been decided that the transactions will appear as a single/combined debit to the account for all transactions made on that day. If multiple transactions occur during the month, you will see a different transaction for each day.

8. **Can we use Wire Transfer accounts?**
   No, only ACH accounts are accepted for the new Direct Payment Process.

9. **Will there be charges to CGDP program participants for this process?**
   Palmetto GBA will absorb Direct Payment Process transaction fees.

10. **What is the purpose of the Batch Payment feature?**
    As an alternative to initiating payments using the interactive user interface, you can create a file which will identify which line items you would like to pay or defer and the dates you would like to initiate payments. In addition to having the ability to defer individual items below $20, as needed, you can also initiate payments for multiple P#s or contract number associated with your company. We expect that Manufacturers, who have a large number (1,200 – 1,500) of line items to pay and/or would like to automate payment initiation, may choose the process. The batch process input file can be created outside of the portal but will need to be submitted through the portal.
    The batch file format is available in the Sponsor's and Manufacturer's New CGDP Portal Direct Payment Process Users Guide.

11. **Can a batch input file cover multiple payment periods?**
    No, each batch input file covers a single payment period.

12. **Can a batch input file cover multiple contracts / Pnumbers?**
    Yes, the format of each line allows you to specify the contract number or P#. All P#s and contracts on your company's invoices are allowed in the input file.

13. **Can I specify to defer line items in a batch input file?**
    Yes, as with the graphical user interface, individual line items below $20 can be deferred. Amounts should only be deferred if they are below the bank minimum. For example, if the bank minimum is $10, then all payments above $10 are expected to be made. Furthermore, payers who choose this option should be prepared to present documentation of this limitation, if requested.

14. **Where will the EFT Files be located?**
    EFT Files are no longer needed with the new process. For companies needing a potential vendor list and 1099 information, we have a Sponsor 1099 Information file (for manufacturers use) and Manufacturer 1099 Information file (for sponsors use) available on the Reports tab of the CGDP portal. This report is similar to the EFT file, containing relevant information. This file will be updated when changes to banking information result in changes to the 1099 related fields.

15. **Will the Due Dates change based upon the time it takes an ACH transaction to clear?**
    No, the CGDP calendar will remain unchanged.

16. **How does one access the new CGDP Portal?**
    A link to the new CGDP Portal is available on the TPAdministrator Website. Once on the website select the *New Direct Payment Process Information* section, and then select *CGDP Portal*. The CGDP Portal Direct Payment Process Users Guides for manufacturers and sponsors is available under the "New Direct Payment Process Information" section of the TPAdministrator.com Website.

17. **What information is available for invoice, payments & receipts data that I can use to integrate with my ERP system?**
    Since ERP system implementations vary from company to company; there is no direct integration with specific ERP systems. If needed, the Payment and Receipts tab in the CGDP Portal Direct Payment Process have options to export the data to Microsoft Excel.

18. **When does this new Direct Payment Process begin?**
    This new Direct Payment Process begins with the Q2 2015 invoicing period and is not retroactive to prior periods.

19. **How is the Dispute process affected by this change?**
    Disputes will now be submitted via the Dispute Management section of the new CGDP Portal. Responses will appear there as well. There are no changes to the process, file formats or timelines.

20. **What software is being used to initiate and manage the payment process?**
    We are using a custom- developed solution for the front end and integrating it with the existing payment processing infrastructure from ProfitStars.

21. **Will I be able to find payment information for quarters prior to Q1 2015 on the new CGDP Portal?**
    No, we will only provide data starting with the Q1 2015 invoicing period on the new CGDP Portal. For prior periods you can contact the TPA for confirmation status only.

22. **What is required to set up my access to the new CGDP Portal and how do I access it?**
    As the primary contact on record, the information entered into the CGDP Portal Login page is the credential information currently used to access the CGDP TPAMailbox. Additionally, a link to the new CGDP Portal is available on the TPAdministrator website. Once on the website, select the New Direct Payment Process Information section, and then select CGDP Portal.

23. **How will older, outstanding payments owed to Manufacturers be resolved?**

These missing payments will need to be resolved before the new Direct Payment Process goes into effect. Please refer to HPMS memo dated June 15, 2015 "[Payment of Outstanding Coverage Gap Discount Program payments](#)" for a detailed description of the process and steps to be followed.

24. **What happens if an initiated payment fails the ACH fund transfer process?**

The unsuccessful payment will move from the Payments Pending Transactions region and back into the Payments Initiation region. Additionally that invoice line item will show a failed status along with the reason code on the right side of that line item. Manufacturers and Sponsors should contact the TPA for their assistance in getting the issue resolved. Also, the TPA Operations staff will review status reports daily and will reach out to the appropriate parties to resolve unsuccessful payments, depending upon the particular cause of the unsuccessful transaction. Once the issue is resolved, the payment transaction will need to be initiated.

25. **Can I use a bank account for sending payments which is different from the account receiving payments?**

Yes. Whatever account you listed on the ProfitStars application will be used for sending payments. This may be the same or different than the account you will be using for receiving payments. If you would like to make changes to this account, please contact TPA Operations at 1-877-534-2772, option 1.

26. **How will we know when payments are still outstanding?**

The new system tracks each invoice line item and updates the status on the site. Settlement of payment initiation is updated overnight, so payers and payees can view and download the current status of any and all their payments. The status of payments should be checked on a regular basis to ensure that transactions successfully process.

27. **How many line items are displayed on each page for the various payment related screens?**

100 line items are displayed for each page. However, you can view all of the items for a reporting period in a payment initiation form by creating a spreadsheet for each page then merging all of the spreadsheets into one.   This would be achieved by selecting the printer button on the screen that has the information you want to list.

28. **How is the bank account EFT information verified?**

The TPA will perform periodic account-validation testing at least once per payment period and as required when CGDP participants make changes to their bank accounts. The validation process will be conducted in the form of a "Penny Test," where $0.01 is deposited by Palmetto GBA into payee accounts on file with the TPA. This amount is funded by the TPA and is not expected to be returned.

29. **Can negative amounts be deferred?**

Yes, but only in limited circumstances. Since a negative amount will appear to the Sponsor as an amount due in the payments tab, it can be deferred if it falls below $20 and is of an amount which cannot be processed by the payer's bank. Furthermore, payers who choose this option should be prepared to present documentation of this limitation, if requested

30. **How long can an amount be deferred?**

Invoiced amounts can be deferred until the combined amounts of the invoiced amount plus the previous deferred amount(s) are greater that the system default allowable amount. If, after 16 quarters, the deferred amount remains unpaid because it is less than the system default allowable amount, the payer must make arrangements with the TPA to pay the deferred amount.

31. **How will you handle payments due to companies who are no longer in business?**
    A message to call the TPA will be displayed for each applicable line item in the Payment Initiation region for cases where payments cannot be initiated using the Direct Payment Process. If the company is in receivership, the TPA Operations team will provide their contact information to arrange payments.

32. **Will we need to add all payees' accounts to our debit block filter, or just one specific account?**
    You will only need to add the one specific account originally sent to you on the initial transition letter. If you no longer have this information please contact TPA Operations.

33. **How will payments be made in the Direct Payment Process?**
    You will no longer be able to pay your invoices via any other method other than through the CGDP Portal using the new Direct Payment Process beginning Q2 2015. This new process is designed to perform ACH transactions per National Automated Clearing House Association (NACHA) rules and guidelines. For each invoice line item or group of line items submitted for payment initiation, the TPA's payment processor, ProfitStars, instructs PNC Bank to issue an aggregated debit to the payer's account on the TPA's behalf. Once the debits have successfully completed, individual payments are transferred to the selected Payee's accounts. For companies who have a debit lock enabled, they will need to inform their bank to allow debits for a specific Company ID, which will be supplied by the TPA. In this process, the TPA is acting as the Third Party Sender and PNC Bank is acting as the Originating Depository Financial Institution (ODFI) per NACHA rules and guidelines. For more information on NACHA and the various roles, please refer to: https://www.nacha.org/ach-network

34. **Since the TPA will be directly debiting my bank account, will I need to set up the TPA or ProfitStars as a new vendor in my Accounts Payable system?**
    No, you do not need to set up a new vendor. This is because you are still making payments to the parties listed on your invoice – not to the TPA or ProfitStars. Once you select items for payment on the new portal, the debits are being executed by PNC Bank. PNC is acting as the ODFI in the ACH process on the TPA's behalf to route the payments to the Payees associated with the selected invoice line items.

35. **When receiving the ProfitStars application, how would a user change the email address when creating an account?**
    The user cannot change the email address to which the invitation was sent. The email recipient is the only person who can create the account. If you would like to have someone fill out the application other than the person who initially received the invitation, please fill out the information below and send to the TPA Operations (tpaoperations@tpadministrator.com). The TPA will then forward this information to ProfitStars and they will issue a new application to the new contact person.

    Contract or P Number:
    Contract Name or Manufacturer Name:
    Current Contact Person:
    New Contact Person:
    New Contact Person Phone Number:
    New Contact Person Email Address:

36. **Does the user have to provide the Driver License # and SSN when filling out the ProfitStars application?**
    These are not required fields. They should be left blank.

37. Can someone fill the ProfitStars application out on behalf of someone else?
No. The application must be completed by the person who received the invitation. If you would like to have the contact person changed, please fill out the information below and send to the TPA Operations. ProfitStars will then issue a new application to the new contact person.

                    Contract or P Number:
                    Contract Name or Manufacturer Name:
                    Current Contact Person:
                    New Contact Person:
                    New Contact Person Phone Number:
                    New Contact Person Email Address:

38. If an entity is represented by a Third Party and will use their bank account information, who should fill out the ProfitStars application?
If the Third Party is making the payments on behalf of the drug manufacturer/sponsor, the application should be filled out by the drug manufacturer/sponsor, but to include the payment information of the Third Party submitter.   A separate letter of authorization must be sent to the TPA on the drug manufacturer/sponsor company letterhead authorizing the Third Party submitter to submit payments on their behalf. Please contact the TPA for assistance with this authorization. Reminder, the drug manufacturer/sponsor, is still ultimately responsible for successfully completing all payments.

39. Is there an easier way for Part D sponsors that have multiple contracts to complete the ProfitStars application?
No. Completing and eSigning each application received is the only option.

40. How can the user reset their ProfitStars password?
From the ProfitStars website, users may reset their own password by clicking the "Forgot Username or Password?" link and following the instructions provided on the screen. If unsuccessful, please contact the TPA Operations at 1-877-534-2772, option 1.

41. The user is unable to sign the ProfitStars agreement. The "check box" next to the Application is greyed out and cannot be enabled to check off.
The user should click the link "Application for Payment Processing" (not the box) and then electronically sign the application.

42. Do all the forms have to be completed on the ProfitStars application?
Yes. The General Information, Welcome, Business Information, Contact Information, Owner/Officer Information, Services/Transaction Types, NSF Collection Options and the Bank Account/Location Info all must be completed. Once each of these forms is completed, the Application for Payment Processing document becomes available for the user to electronically sign and the option to print.

43. Who should I contact if I have any questions concerning the ProfitStars application process?
All questions related to the ProfitStars application process should be directed to the TPA Operations by phone at 1-877-534-2772, option 1, or by email at **tpaoperations@tpadministrator.com** .

44. What bank account information will be used to make payments for the CGDP?
The account information that you provide on the ProfitStars application will be used to make payments. This will be the account from which you would like to have funds removed to make payments to an entity. If you have not received a ProfitStars application, please contact TPA Operations at 1-877-534-2772, option 1.

45. **What bank information will be used for receiving payments?**

For receivables (i.e. ACH Deposits), the bank information listed on the EFT form you provided to TPA Operations will be used. Note: This form must be completed even if you will be using the same account for both making and receiving payments. To complete this form, visit www.tpadministrator.com – EFT Information- EFT Online Form (For Manufacturer Use Only) or EFT Information- EFT Online Form (For Sponsor Use Only), and complete the form in its entirety. The completed form should be submitted online, and a printed signed copy must be mailed to the TPA at the address listed on the form. If you're unsure if you have the correct EFT on file, please contact TPA Operations at 1-877-534-2772, option 1.

46. **I completed an EFT form only a few months ago – why do I need to complete a new one?**

If you have completed an EFT form since 04/01/2015, then you do not need to complete another EFT form. Otherwise, the form has been changed to reflect the functionality of the new Direct Payment Process and a new form is required in order for you to receive any payments due to you as of the Q2 2015 invoicing period.

47. **How can users be sure that this payment process is secure, preserves transactional integrity, and minimizes risk to stakeholders?**

The core of this payment processing solution has been in use for some time to support other government programs as well as many companies in the private sector. This specific solution has been technically reviewed by CMS and is periodically reconciled by the TPA's Finance team and submitted to an annual NACHA audit. Additionally, the Blue Cross Blue Shield of S.C.'s (BCCSSC) systems and infrastructure deployed within the multi-tier technical architecture are initially deployed in accordance with tightly governed, secure baseline configuration standards which are based on proven industry best practices that when followed, provide protection against known threats and is constantly monitored for secure operation.

48. **What role does ProfitStars play in the new Direct Payment Process?**

ProfitStars is one the vendors which comprise the Blue Cross Blue Shield of S.C.'s (BCCSSC) payment solution, which the CGDP Portal leverages. ProfitStars role in the ACH process is that of a Third Party Sender, which passes the payment initiation requests and relevant statuses between the underwriting financial institution, PNC Bank, and the CGDP Portal.

49. **What experience does ProfitStars have with government payment systems?**

The BCBSSC payment solution, which includes ProfitStars, has been used for both ACH and credit card payments for government programs within the Blue Cross family including: Blue Cross Blue Shield of SC, Palmetto GBA, BlueChoice Health Plan, HSA Bank, PAI (Planned Administrators, Inc.), TDA (Total Dental Administrators), Palmetto GBA's Jurisdiction 11 Medicare Administrative Contract (MAC) & Railroad Retirement Board Specialty MAC, CGS' Jurisdiction 15 MAC and Companion Global Healthcare. They are also used in a wide variety of public sector applications.

50. **I am the authorized user but unable to log into the system. What should I do?**

Contact the TPA. They will be able to reset your password, PIN or security questions after providing proof of authorization

51. **I am the authorized user but will be unavailable during a time when invoices will need to be paid. How will the payments be made for my company?**

If the invoices have been distributed, you have the option of selecting payments but selecting a future payment date for initiation. The initiation of the payment transaction will not occur until the date selected. Alternatively, the TPA will be able to reassign your privileges to another person of your choosing while you are unavailable. This process should take less than a day.

52. Will the TPA automatically withdraw funds to cover all of the amounts due on my invoice?

No. Only the amounts associated with the line items you've selected to pay on the Payments Tab of the CGDP portal will be withdrawn. For example, if your invoice contains 10 lines where each line item is for $10. You log in and select 3 of those items for payment before logging out. Overnight, an ACH debit for $30 will be executed to cover those three items. The remaining 7 line items, totaling $70 will remain outstanding until you log in again and initiate payment.

53. Is there a possibility that an amount in excess of the amount owed could be debited from my account or could be debited more than once for the same invoice line item?

No. The amounts of the debits are directly tied to the quarterly invoice data and these amounts cannot be altered by the user. The amounts to be debited are based upon the amounts submitted for payment by the user. Once payment for invoice line items has been initiated, it cannot be initiated again either through the Web interface or the batch payment initiation feature. Any attempt on re-initiating a successful payment will receive an error message.

54. How will the 1099 submission process change for my company with the new Direct Payment Process?

There should be very little change. Your company is still paying the company listed on your invoice, so you will still issue 1099 forms as always. The only difference is that the Payee information will be contained in the 1099 Information report found on the Reports Tab of the new CGDP portal.

55. How can I update my contact information in HPMS?
Drug Manufacturers

1. Log into HPMS (Health Plan Management System)
2. On the Drug Manufacturer Contract Management Start Page, select Contract Data on the left navigation bar.
3. On the Update Contract Data page, add or edit contact data as needed.
   - As noted in the Contact Type column, some contacts are required; some are optional.
   - Please make sure that your company has the proper contact person listed for TPA Liaison and CGDP Payment Contact.
   - When filling out information for a contact, at a minimum, fill out all required fields. These are noted with an asterisk (*).
4. Click Submit. Then, on the Confirmation Page, click Submit again to return to the Drug Manufacturer Contract Management Start Page.

Please note* TPA Liaison is the primary point of contact that facilitates a close working relationship with the TPA Operations associates. CGDP Payment Contact is the primary contact person for payment issues and financial related communication. This person should be able to make financial decision and be authorized to sign financial documentation.

Plan Sponsors

1. Log into HPMS (Health Plan Management System).
2. On the Contract Management Start Page, click on Basic Contract Management.
3. Select your contract number.
4. On the menu option, choose Contact Information and then click on the hyperlink "Contact Data".
5. On the Update Payment Contact page, add or edit contact data as needed.
   - As noted in the Contact Type column, some contacts are required; some are optional.
   - Please make sure that your company has the proper contact person listed for Third Party Administrator Liaison (for Part D Sponsors) and Coverage Gap Discount Program Payment Contact (for Part D Sponsors and Manufacturers).
   - When filling out information for a contact, at a minimum, fill out all required fields. These are noted with an asterisk (*).
6. Click Submit. Then, on the Confirmation Page, click Submit again to return to the Contract Management Start Page.

Please note* Third Party Administrator Liaison is the primary point of contact that facilitates a close working relationship with the TPA Operations associates. Coverage Gap Discount Program Payment Contact is the primary contact person for payment issues and financial related communication. This person should be able to make financial decision and be authorized to sign financial documentation.