ONBOARDING TRAINING

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Coverage Gap Discount Program (CGDP)

CGDP Onboarding Training

Onboarding is the training process that describes requirements all Drug Manufacturers are encouraged to complete in order to fulfill program requirements of the Coverage Gap Discount Program (CGDP).

In this training you will learn about –

- Program Overview
- Welcome Letter and Forms to be Completed
  - Manufacturer Forms
  - Health Plan Management System (HPMS) Access
- CGDP Portal Access
  - Accessing the Portal
  - Initiating Payments
  - Reports
  - Disputes
- Getting Help

Program Overview

- As of January 1, 2011, the Affordable Care Act became effective and in accordance with this legislation, the Medicare Coverage Gap Discount Program was established

- The CGDP requires that Sponsors provide Part D beneficiaries with a discount for applicable drugs at the point of sale. Drug Manufacturers are required to reimburse the Sponsor for this discount

- Section 1860D-14(A) (d) requires that CMS contract with a Third Party Administrator (TPA) to:

  - Receive and transmit information between CMS, pharmaceutical Manufacturers, and other entities as appropriate

  - Receive, distribute, or facilitate the distribution of funds of pharmaceutical Manufacturers and Part D Sponsors to appropriate entities

  - Provide adequate and timely information to pharmaceutical Manufacturers

- The TPA is the single point of contact between the pharmaceutical Manufacturers (including their third party vendors) participating in the CGDP

Program Overview
Coverage Gap Discount Flow

- Part D Sponsors (Sponsors) advance Gap Discounts to beneficiaries at point of sale

- Sponsors submit prescription drug event (PDE) records to CMS recording the Gap Discount amount

- CMS aggregates qualifying PDE data and sends the resulting invoices to the TPA

- TPA sends quarterly invoice and reports data to pharmaceutical Manufacturers (Manufacturers) and Sponsors simultaneously via the CGDP Portal

- Manufacturers and Sponsors use the CGDP Portal to pay the invoice and invoice adjustment amounts in full within 38 days after invoice distribution

- TPA collects payment statuses and program compliance data from the CGDP Portal and submits statistics to CMS

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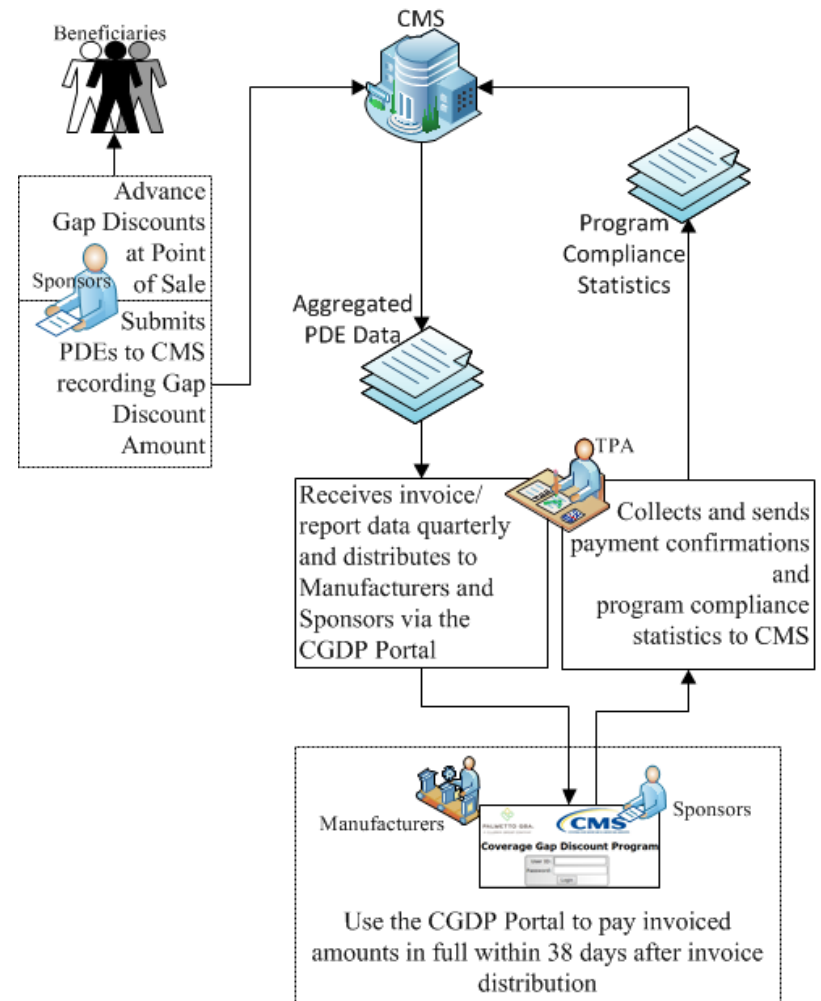
Program Overview
Invoice Distribution Schedule

On a quarterly basis the TPA distributes invoice and data files to Manufacturers based on qualifying PDE data submitted to CMS.

The table displayed below provides the reporting period quarter end and report distribution dates for 2017.

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

A full program calendar can be found at the TPA website http://tpadministrator.com.

 The *CGDP Calendar* link appears on the left side of the TPA website page.

Select the *Medicare Part D Coverage Gap Discount Program Calendar* link to view the full calendar.
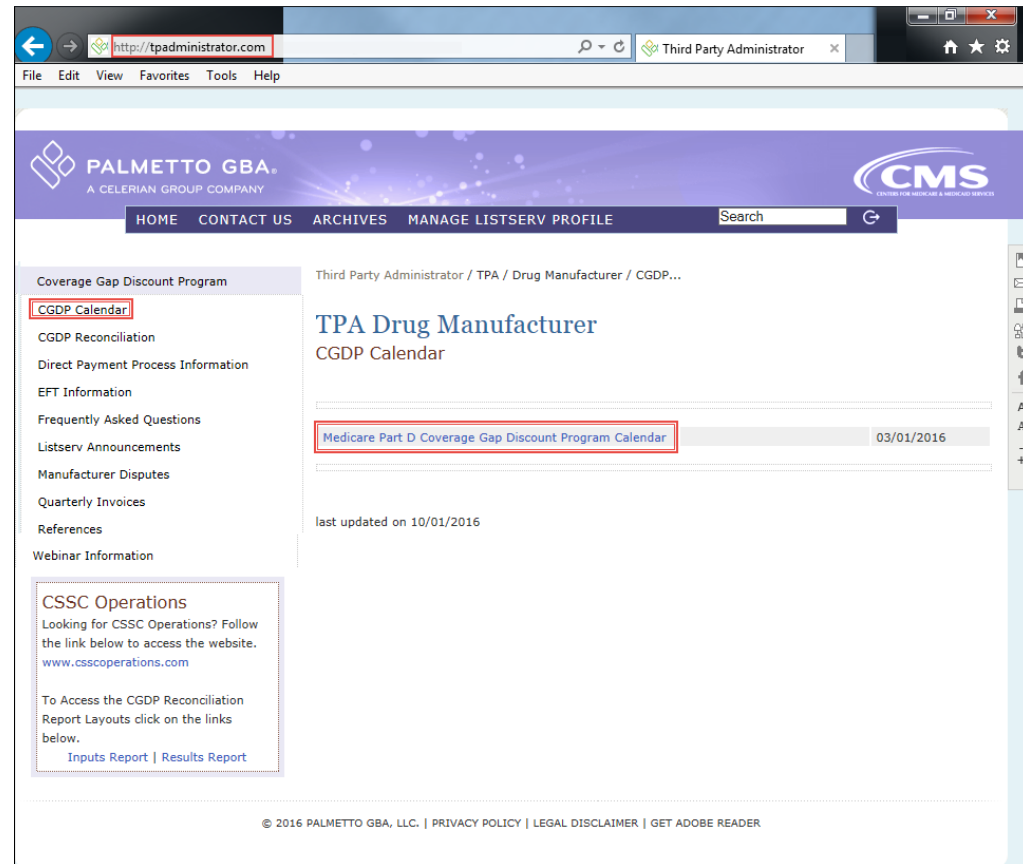
ONBOARDING FORMS

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Coverage Gap Discount Program (CGDP)

Onboarding Form Requirements

Drug Manufacturers (and their Third Party Vendors) that participate in the CGDP supply onboarding information to allow the TPA to act as the single point of contact to facilitate the distribution and receipt of funds between the participating entities.

For Manufacturers, the following forms are required:

- Welcome Letter
- CMS HPMS Access via Enterprise User Authentication (EUA) Form
- Electronic Funds Transfer (EFT) Online Form (ACH Deposit)
- ProfitStars Application (Automated Clearinghouse (ACH) Payment)

Manufacturer Onboarding Form Requirements

Manufacturers will receive a four page Welcome Letter from the TPA Support Center with instructions for completing and submitting these forms:

- Welcome Letter Form pages two and three
- Payment Information Form (ACH Deposit)
- ProfitStars application (ACH Payment)*

Access to the majority of these forms is available via the TPA website at http://tpadministrator.com.

*Provided in separate email to the Manufacturer TPA Liaison or a TPA Liaison designated Manufacturer point of contact (POC) for financial/payment related communications.

Manufacturer Welcome Letter – Page One

The first page of the Welcome Letter provides new Manufacturers with instructions for gaining access to the CGDP Portal and a listing of online and paper forms requiring completion.

CMS
CENTERS FOR MEDICARE & MEDICAID SERVICES
CENTER FOR MEDICARE

Third Party Administrator (TPA) Support Center

Third Party Administrator (TPA) Support Center for Drug Manufacturers welcomes you to the Coverage Gap Discount Program (CGDP). We provide online access to process invoice payments, submit invoice disputes, and retrieve Invoice, Data, Tracking, and Sponsor 1099 reports. According to the data provided in the Health Plan Management System (HPMS), your Submitter ID (**XP9999 – CGDP TPA, Inc.**) will be effective 1/1/2017. In order to receive these reports we must establish connectivity between the TPA and your Submitter ID. To set up connectivity, please complete Tables 1, 2, and 3 in this document and submit to the TPA Operations via email at tpaoperations@tpadministrator.com.

Manufacturer Welcome Letter – Page Two

The next page of the Welcome Letter requires the completion of the three tables provided on the form.

- Table 1: Manufacturer Labeler Information
- Table 2: Manufacturer Contact Information
- Table 3: Third Party Vendor Reports

Once completed, scan the page(s) containing the tables and send them to the TPA Operations via email: tpaoperations@tpadministrator.com.

Upon receipt of the scanned form and validation of HPMS data, login credentials will be provided to the TPA Liaison contact listed on the HPMS website.

Manufacturer Welcome Letter – Page Three

The last page of the Welcome Letter provides Manufacturers with a checklist of documents and links referenced in the instructions on the letter's prior pages.

This checklist is provided for Manufacturers to track the documents and due dates of each required document and its corresponding link, if applicable.

Table 4: Documents Checklist

Checklist of Documents/Links referenced in the Welcome Letter and applicable due dates.

DOCUMENT	FORM DESCRIPTION	DUE DATE
Welcome Letter	Instruction	
Electronic Funds Transfer (EFT) Online Form Payment Information Form	Receive deposits from entities **(Form submitted electronically)**	
Profit Stars Application (ACH Payments)	Make payments to entities	
CGDP Portal Registration	Access to reports, initiating payments or submitting and reviewing disputes **(Login credentials will be provided by TPA Operations)**	
Listserv Registration Listserv Profile	Ability to receive email announcements from TPA Operations	
Third Party Registration Form (If applicable)	Complete if Third Party is managing payments or retrieving reports **(Form to be mailed to TPA Operations)**	
HPMS Point of Contact Information HPMS website	Website **(Ensure this is the most current information)**	

Manufacturer
CMS HPMS Access – EUA Form

Manufacturer associates listed in the Welcome Letter as the TPA Liaison must have access to HPMS to be granted access to the CGDP Portal.

In order to obtain HPMS access, the EUA Workflow Request form must be completed. An excerpt of the EUA Workflow Request Form is provided here:

DEPARTMENT OF HEALTH AND HUMAN SERVICES
CENTERS FOR MEDICARE & MEDICAID SERVICES

EUA WorkFlow Request No.

APPLICATION FOR ACCESS TO CMS COMPUTER SYSTEMS

1. **TYPE OF REQUEST** (Check only one):

☐ NEW (Issue a CMS UserID)   ☐ CERTIFY (Due date: ___/___)
                                              mo   yr

☐ CONNECT/DISCONNECT   ☐ CHANGE USER INFORMATION (Note new info)
   (Add/remove access authorities)   ☐ DELETE (Remove CMS UserID from all CMS systems)

USERID (Capital Letters)

2. **USER INFORMATION**

☐ CMS Employee
☐ Medicare Advantage / Medicare Advantage with Prescription Drug / Prescription Drug Plan / Cost Contracts – Using HPMS Only
☐ Medicare Advantage / Medicare Advantage with Prescription Drug / Prescription Drug Plan / Cost

☐ Federal Govt – Centers for Disease Control & Prevention
☐ Federal Govt – Commission Corps
☐ Federal Govt – Dept of Health & Human Services
☐ Federal Govt – HHS – OMHA
☐ Federal Govt – Dept of Justice

To assist with completing the EUA Workflow Request Form , the TPA Operations can provide directions to new Manufacturers.

Manufacturer Login Credentials

It is a CMS requirement that the TPA Liaison contact entered in Table 2: Manufacturer Contact Information must be the same person listed as the TPA Liaison contact in HPMS.

Note:

Login credentials will *only* be provided to the TPA Liaison contact. Login credentials will not be provided if the TPA Liaison Contact listed in the Welcome Letter differs from the TPA Liaison contact listed in HPMS.

In addition, deadlines will not be excused or extended for failure to have the correct TPA Liaison contact information listed on the HPMS website.

Manufacturer User ID and Password Emails

After verification that the TPA Liaison in HPMS matches the TPA Liaison contact on the Welcome Letter, the TPA Liaison will receive two separate emails with CGDP Manufacturer Portal access information; the first with the User ID, and the second with the initial password.

The CGDP Portal is used to facilitate the CGDP quarterly invoicing and direct payment processing.

To: Juliet.Caplet@cgdptpa.com
Sent: Thursday, April 21, 2016 11:02 AM
From: TPA Operations
Subject: CGDP User ID

Hello Juliet,

To access the new portal, follow the steps below:
- www.tpadministrator.com
- Direct Payment Process Information
- CGDP Portal

Your User ID is XP9999 and your temporary password will follow on a separate email.

Thank you,
TPA Operations
1-877-534-2772 Option 1

To: Juliet.Caplet@cgdptpa.com
Sent: Thursday, April 21, 2016 11:03 AM
From: TPA Operations
Subject: CGDP Password

The following is assigned to the user id for the Coverage Gap Discount Portal and must be entered as displayed below:

password

Thank you,
TPA Operations
1-877-534-2772 Option 1

Manufacturer ACH Deposit Form

Manufacturers are required to complete an EFT form to provide a depository account to receive Sponsor CGDP adjustment funds paid via the CGDP Portal.

The form is located on the TPA website, http://tpadministrator.com.

Select the *EFT Information* link on the left-hand side of the webpage and once the *EFT Information* page appears, select the *Payee Bank Account Change Form (account for receiving payments)* link.

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Manufacturer EFT Online Form

The EFT Online Form will be sent to the TPA Liaison listed in the Manufacturer Welcome Letter. The TPA Liaison can designate a different POC user, if necessary, to fill out the EFT Online form's five sections:

- Organization Information
- Mailing Address for 1099 Tax Form
- Financial Institution
- Form Completed By
- Authorized Signer Information

Once all sections are completed, the user completing the EFT Online form selects the 'Initiate Request' button at the bottom of the form.

Initiate Request

The 'Initiate Request' button initiates the Adobe Sign eSignature process for the verification and validation of new EFT account activity required for CGDP participation.

Manufacturer Completed EFT Online Form

Once the form is completed and initiated, the TPA receives the form for validation and verification.

This process utilizes Adobe Sign eSignature functionality to provide authorization and audit trail information for the form originator, the authorized signer, and TPA Operations.

Adobe Sign eSignature information is transmitted via email to the contact information provided in the *Form Completed By* and *Authorized Signer Information* sections of the EFT Online Form.

The Document Submission Success message, displayed below, lists the email address of the person listed in the *Authorized Signer Information* after the 'Initiate Request' button has been selected.

Document Submission Success

The document has been submitted successfully and will undergo validation before being sent to the specified authorized signer:
Franc.Sterling@cgdptpa.com

Click here to submit another document.

Manufacturer ProfitStars Application Process

After the TPA receives the electronic version of the EFT Online form, a ProfitStars invitation email will be forwarded to the authorized Manufacturer TPA Liaison or designated POC.

To access ProfitStars to complete an account application form, select the "click here" link (highlighted in red) in the email.

This application will provide account information that will be utilized to make CGDP invoice payments via the CGDP Portal.

From: JHA <do-not-reply@securemail.jhasecuredoc.com>
Sent: Thurs 4/21/2016 10:15 AM
To: Juliet.Caplet@cgdptpa.com
Subject: Your ProfitStars Application for P9999 – CGDP TPA, INC.

Hello Juliet Caplet :

You recently received notification from the Third Party Administrator (TPA) Support Center regarding changes to the Coverage Gap Discount Program (CGDP). This email invitation is related to collecting information and authorization for the company bank account that will be debited to make payments to program participants. The TPA will separately collect company bank account information from you designating where received funds should be deposited,

Please click here to complete the enrollment process. Once the web portal opens, you will need to create an account following the online instructions in order to provide the required information. To complete this application, you will need to provide information on a series of screens. To move to the next section, simple click 'Save' at the bottom of the screen and the system will automatically navigate you to the next section. If you'd like to see all sections of the application prior to starting, click 'Return to Application'. You may complete the application in order, or you may complete individual sections. Some sections are already prepopulated and as such, you'll simple click 'Save' to move forward. Once you've provided all the required information, you'll be returned to the main menu and a link to the completed application will display on the right side of the screen. If any changes are required to the completed form, simply access that section of the application again and make the necessary updates and 'Save'.

Once the complete application is ready for signature, select the 'Owner/Officer' link to forward the complete application via email to the primary officer you listed on the application. The officer will receive an invitation to electronically sign the form on behalf of the company. The application will not be considered complete until the eSignature is received.

You will receive a separate email invitation for each contract number; each invitation must be completed. If you receive multiple invitations, you only need to create an account once. Each subsequent invitation can be accessed with the same username and password.

This enrollment process should take no more than 15 minutes. If you need assistance or have any questions, please contact TPA Operations at 1-877-534-2772, option 1, or tpaoperations@tpadministrator.com. Please reference ProfitStars application # ABC123.

Manufacturer ProfitStars Application

The link listed in the invitation email will open the ProfitStars site to allow the Manufacturer TPA Liaison or designated POC to create an access account and complete the ProfitStars application.

Once each of the items under the <u>Forms</u> column on the ProfitStars website (highlighted in red) has been completed, an application number will be supplied and a system generated email will be sent.

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Manufacturer ProfitStars Application Signature

After the application has been reviewed by ProfitStars, an *Application Ready for Signature* email will be sent to the authorized signer for the company.

From: JHA <do-not-reply@securemail.jhasecuredoc.com>
Sent: Thurs 4/25/2016 10:15 AM
To: Franc.Sterling@cgdptpa.com
Subject: Your ProfitStars Application for P9999 – CGDP TPA, Inc. is ready for signature

Hello Franc Sterling,

Juliet Caplet has indicated that the ProfitStars application related to processing payment for the CMS Coverage Gap Discount Program (CGDP) is complete and ready for your signature.

Click here to review and sign the application. Once the web portal opens, you will need to create an account following the online instructions in order to electronically sign the application. You will receive a separate email for each contract application; each subsequent application can be accessed with the same username and password. Once the web portal opens, select the 'Application for Payment Processing' on the right side of the screen. Once you have reviewed, simple click 'Sign' to complete the process.

Upon accessing ProfitStars and creating an access account, the authorized signer will select the *Application for Payment Processing* item listed under the Documents column on the right-hand side of the page (highlighted in red above), review the application for content, and either sign the application electronically or reject the application.

Manufacturer Third Party Vendor Onboarding Form Requirements

If a Third Party vendor is designated by a Manufacturer in the Manufacturer Welcome Letter, the TPA Support Center will send a two page Welcome Letter to the third party vendor using the email supplied in the Manufacturer Welcome Letter Table 3: Third Party Vendor Reports.

The TPA Support Center email will contain a two page Third Party Vendor Welcome Letter with instructions for completing and submitting information to the TPA via email.

Third Party Vendor Welcome Letter – Page One

The first page of the Welcome Letter provides a brief introduction to the CGDP for Third Party Vendors, how to submit the completed form back to TPA Operations, and instructions for the second page of the Welcome Letter requiring completion.

Third Party Administrator (TPA) Support Center

Third Party Vendor Welcome Letter

The Third Party Administrator (TPA) Support Center for the Coverage Gap Discount Program (CGDP) welcomes you to the program. We provide online access to retrieve Invoice, Data and Tracking reports, as well as process invoice payments and dispute invoice amounts. In order for you to retrieve your Manufacturer or Sponsor reports, we must establish connectivity between the TPA and your Submitter ID. To set up connectivity, please complete Tables 1 or 2, as applicable, in this document and submit to TPA Operations via email at tpaoperations@tpadministrator.com.

The Third Party Vendor document is due by January 31 2017, 11:59 pm ET.

Once we receive this information, two separate emails from the TPA Operations containing a User ID and password for the DPP System will be provided to the Primary Contact Person listed in Table 1 or Table 2.

Manufacturer Third Party Vendor Welcome Letter – Page Two

The second page of the Welcome Letter provides information about the Manufacturer authorizing the third party organization access to CGDP information.

There are two additional tables that are located on the second page. One of these tables should be completed by the third party vendor with the applicable information, based on the Third Party Vendor Status check box prefilled by the TPA Operations in the table below.

Third Party Vendor Name	Submitter ID	
Third Party Vendor Systems, LLC	XTP099	
Drug Manufacturer /Sponsor Name	**Agree**	**Disagree**
CGDP TPA, Inc.	☒	☐
Third Party Vendor Status	New: ☒	Established: ☐

The check box populated in the Third Party Vendor Status field designates information the vendor receiving the Welcome Letter will complete.

The two additional tables are:
- Table 1: New Third Party Vendors
- Table 2: Established Third Party Vendors

ACCESSING THE CGDP PORTAL

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Coverage Gap Discount Program (CGDP)

CGDP Portal Access

The CGDP Portal is designed to assist Manufacturers with processing Coverage Gap Discount Program payments. This system allows Manufacturers to review invoice line items and initiate bank-to-bank ACH transfers for invoice line item payments, similar to the way an online banking customer pays a monthly bill.

The CGDP Portal will provide functionality for the following:

- Invoice review
- Invoice payment deferment*
- Automatic payment confirmation
- Invoice dispute submission and resolution

- Invoice payment selection
- Batch Invoice payment selection
- Payment receipt review
- Reports retrieval

The CGDP Portal became the active system for processing CGDP payment requirements with the 2015 Q2 reporting period.

*Invoice payment deferment occurs under limited circumstances and is detailed in the Manufacturer Portal Direct Payment Process (DPP) Users Guide.

CGDP Portal via TPAdministrators.com

CGDP program participants can access the CGDP Portal via the TPA website: http://tpadministrator.com.

Once on the site, select the *Direct Payment Process Information* link located on the left side of the page.

After the Direct Payment Process Information page opens, locate and select the *CGDP Portal* link.

CGDP Portal Roles

The CGDP Portal contains two roles for Manufacturers to gain access:

- Payment Initiator role
- Administrator role

The HPMS TPA Liaison contact is automatically assigned these two roles for Manufacturers, however the Payment Initiator role can be assigned to a separate associate, listed in HPMS as the Coverage Gap Discount Program (CGDP) Payment Initiator, who will have the responsibility of processing payment of invoice line items submitted each quarter.

Users assigned the Payment Initiator role will have access to all functionality in the Portal and be required to provide a four-digit numeric PIN pass code for processing payment initiation authorization. The four-digit PIN is created during security setup.

Users assigned the Administrator role will have access to all functionality, except payment initiation authorization.

Detailed instructions for security setup and payment functionality resides in the CGDP Manufacturer Portal Direct Payment Process (DPP) Users Guide.

CGDP Users Guides via TPAdministrators.com

CGDP program participants can access the CGDP Portal Users Guides via the TPA website http://tpadministrator.com.

Once on the site, select the *Direct Payment Process Information* link located on the left side of the page.

After the Direct Payment Process Information page opens, locate and select the *Manufacturer Portal Direct Payment Process (DPP) Users Guide* link.

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CGDP Portal Login

For daily access, authorized users of the Portal will use the Login form to access the CGDP Portal.

- The User ID is the Corporate ID for Manufacturers

- HPMS-assigned Manufacturer TPA Liaison or Coverage Gap Discount Program (CGDP) Payment Initiator personnel are sent an temporary password for initial access and are responsible for changing and maintaining their permanent password every 30 days

- Manufacturers associates are assigned one of two roles for access to the Portal, Payment Initiator and Administrator

- All invoice and report data is loaded to the Portal for access and review by Payment Initiator and Administrator role associates

Detailed instructions for accessing the CGDP Portal resides in the CGDP Manufacturer Portal Direct Payment Process (DPP) Users Guide.

CGDP Portal Login – User Validation Form

After entering the User ID and Password successfully, a random security question appears from the three security questions selected during initial security data setup. Enter the correct answer and select the *Validate* button.

Detailed instructions for CGDP Portal initial security setup resides in the CGDP Manufacturer Portal Direct Payment Process (DPP) Users Guide.

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CGDP Manufacturer Portal Login – Successful Login

Once entered correctly, the Manufacturer Portal Home tab becomes available.

Detailed instructions for accessing the CGDP Portal resides in the CGDP Manufacturer Portal Direct Payment Process (DPP) Users Guide.

INITIATING PAYMENTS

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Coverage Gap Discount Program (CGDP)

CGDP Portal – Initiating Quarterly Invoice Payments

The CGDP Portal Payments tab allows a user to review and process payment information for quarterly invoice line items by Sponsor contract number for Manufacturers.

- Payments can only be made via the CGDP Portal

- Payment amounts automatically populate from the quarterly invoice and are not subject to modification

- Payments must be paid no later than 38 days after the distribution of the invoice

- Payments must be made even if the Manufacturer is disputing the invoice

- Manufacturers can perform these payment functions in the CGDP Portal

  - Individual invoice payment functionality

  - Future Date invoice payment functionality

  - Initiate All invoice payments functionality

  - Payment Initiation Upload Batch functionality

  - Stop Payment functionality

  - Defer Payment functionality

Detailed instructions for payment functionality resides in the CGDP Manufacturer Portal Direct Payment Process (DPP) Users Guide.

CGDP Portal
Manufacturer Payments Tab – Quarterly Invoices

The Payments tab contains eight regions:

1) The Tabbed region displays the active tab
2) The Invoice Reporting region displays the current reporting period
3) The Payments Due region displays the date payments are due
4) The Filter region – Payments allows filtering of invoices by selected criteria
5) The Payment Information region provides numerical totals of all invoice line items and their qualifying status
6) The Payment Initiation region displays payment eligible invoices by Contract Number and Invoiced Amount and/or Previous Deferred Amount
7) The Payment Initiation Upload region provides a location to upload payment batch files
8) The Pending Transactions region displays invoice line items that are pending payment processing

Detailed instructions for processing Invoice Payments resides in the CGDP Manufacturer Portal Direct Payment Process (DPP) Users Guide.

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INVOICE REPORTS

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Coverage Gap Discount Program (CGDP)

Onboarding Training – Invoice Reports

- Distributed quarterly to Manufacturers via the CGDP Portal

- Provides gap discount amounts summarized into invoices based on P Number

Detailed instructions for downloading Invoice reports reside in the CGDP Manufacturer Portal Direct Payment Process (DPP) Users Guide found on the TPAdministrator.com website.

Manufacturer Invoice Report

Manufacturers are able to utilize the CGDP Portal to view reports of distributed invoice line items available for processing.

The population of the Invoice radio button allows a user to select and view distributed invoice line item reports. The report provides abbreviated information of distributed quarterly or Calendar Year (CY) invoices and provides the ability to download the information for review.

Detailed instructions for accessing Invoice Reports resides in the CGDP Manufacturer Portal Direct Payment Process (DPP) Users Guide.

DATA REPORTS

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Coverage Gap Discount Program (CGDP)

Onboarding Training – Data Reports

- Distributed quarterly to Manufacturers

- Provides Manufacturers the opportunity to review inputs to the invoice

- Incorporates changes in subsequent quarters due to adjustments or deletions of PDEs

- Utilized by Manufacturers for creating dispute files submitted via the CGDP Portal

Detailed instructions for downloading Data reports reside in the CGDP Manufacturer Portal Direct Payment Process (DPP) Users Guide found on the TPAdministrator.com website.

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Manufacturer Data Report

Manufacturers are able to utilize the CGDP Portal to review detail data reports for distributed quarterly or Calendar Year (CY) invoices line items.

The population of the <u>Data</u> radio button provides a user with reports containing summary information of the PDE's combined to create the total invoice line item amount distributed to the Manufacturer.

Detailed instructions for accessing Data Reports resides in the CGDP Manufacturer Portal Direct Payment Process (DPP) Users Guide.

TRACKING REPORTS

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Coverage Gap Discount Program (CGDP)

Onboarding Training – Upheld Dispute Tracking Report

- Distributed annually to Manufacturers
  - Cumulative CY Closeout reports that provide the status of adjustments performed on all upheld disputes for the closed benefit year
- Tracking reports will include multiple benefit years

Detailed instructions for downloading Tracking reports reside in the CGDP Manufacturer Portal Direct Payment Process (DPP) Users Guide found on the TPAdministrator.com website.

Manufacturer
Upheld Dispute Tracking Report

Manufacturers are able to utilize the CGDP Portal to view reports of all upheld disputes.

The Upheld Dispute Tracking Report for Manufacturers provides the status of invoiced PDEs that were disputed and subsequently upheld. The purpose of the report is to inform Manufacturers of any adjustment or deletion activity undertaken by the Sponsor in response to the upheld dispute.

Detailed instructions for accessing the Tracking Report resides in the CGDP Manufacturer Portal Direct Payment Process (DPP) Users Guide.

BATCH REPORTS

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Coverage Gap Discount Program (CGDP)

Onboarding Training – Batch Reports

- Generated when the Batch Upload Payment Process is utilized to process payment initiations

Detailed instructions for utilizing the Batch Upload Payment Process functionality and downloading Batch reports reside in the CGDP Manufacturer Portal Direct Payment Process (DPP) Users Guide found on the TPAdministrator.com website.

CGDP Portal
Manufacturer Batch Report

Manufacturers are able to utilize batch reports to review the outcome of the Payment Initiation Upload batch processing of multiple invoice line items and provide uploaded batch file results for quarterly invoice processing.

A user is able to view batch file status for successful processing, partially or totally rejected batch file uploads, and review errors associated with rejected records.

Detailed instructions for accessing Batch Reports resides in the CGDP Manufacturer Portal Direct Payment Process (DPP) Users Guide.

1099 INFORMATION REPORTS

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Coverage Gap
Discount Program
(CGDP)

Onboarding Training – Sponsor 1099 Reports for Manufacturers

- Loaded to the Portal for access to 1099 non-bank account information, such as Sponsor Contract Number; Company Name; EIN/TIN; IRS Street Address, City, and State.

Detailed instructions for downloading 1099 reports reside in the CGDP Manufacturer Users Guide found on the TPAdministrator.com website.

1/25/2017

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CGDP Portal – Manufacturer Sponsor 1099 Information

Manufacturers are able to utilize the CGDP Portal to review the Sponsor 1099 Information report which provides non-bank account information for Manufacturers to utilize for tax reporting purposes.

Detailed instructions for accessing Invoice Reports resides in the CGDP Manufacturer Portal Direct Payment Process (DPP) Users Guide.

DISPUTES PROCESS

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Coverage Gap Discount Program (CGDP)

Manufacturer Disputes Process

The CGDP Portal allows Manufacturers to submit disputes for invoiced PDE records included in quarterly invoices.

- Manufacturers have 60 calendar days from the date of invoice receipt to submit a dispute file
  - Receipt of the invoice is considered to be one calendar day after the TPA loads the invoice and data reports to the CGDP Portal

  - Even though a Manufacturer may choose to dispute an invoiced PDE, the invoice must be paid in full within 38 days after invoice distribution

  - The Portal provides functionality to assist Manufacturers with creating dispute files utilizing the Dispute Builder process
    - The Dispute Builder process assists with creating dispute files from PDE line item data files received for the current quarter with required information needed to support dispute line items

Manufacturer Disputes Process (continued – page two)

- Dispute files may only contain data for a single P Number
  - Files containing multiple P Numbers for a Corporate ID will error out during the Portal edit processing

Dispute files submitted by Manufacturers are subjected to multiple edit processes.

- TPA performs edits on dispute files that are created or loaded in the Portal and have obtained a "Passed" status and are then forwarded to the Drug Data Processing System (DDPS) contract for additional edits

  - DDPS edits dispute files line-by-line, not by a submitted file in its entirety
    - If a dispute record is Accepted by DDPS, it will be reviewed by CMS
    - If a dispute record is Rejected by DDPS, a Manufacturer may re-file any rejected line records by correcting and resubmitting the updated PDE line items via the Portal before the submission deadline

Manufacturer Disputes Process (continued - page three)

- Manufacturers should allow enough time for dispute files to complete edit processing and error correction, which may take more than one day
  - Waiting until the last day of the submission deadline is not recommended; Just because you started your dispute process before the submission deadline does not count toward meeting the deadline
  - Dispute line items only count as eligible to be submitted if each line item obtains a *Passed* status from TPA and an *Accepted* status from DDPS prior to the submission deadline

- After the dispute line item has been *Accepted* by DDPS, Manufacturers can send supporting documentation and attachments to disputes@tpadministrator.com

- Dispute Resolutions are available for review in the Portal 60 days following the dispute file submission deadline
  - Dispute determinations can be either Upheld or Denied

- Sponsors are obligated to fix the incorrect data that caused the upheld dispute and can adjust financial and/or non-financial fields to correct the upheld disputes
  - The Reported Gap Discount amount may or may not change due to an upheld dispute

Additional Dispute Information
Dispute File Format

Documentation to assist with dispute file report formats can be located on the http://tpadministrator.com website under the following links:

- **HPMS Memo: Updates to the Medicare Coverage Gap Discount Program Manufacturer Dispute and Appeals Submission Process**
- **Contract Dispute File (Effective February 8, 2015)**
- **Dispute Edits (Effective February 8, 2015)**
- **Dispute Reasons (Effective February 8, 2015)**
- **Dispute Resolution Report File Layout (Effective February 8, 2015)**
- **Dispute Return File (Effective February 8, 2015)**
- **Dispute Submission File (Effective February 8, 2015)**
- **Dispute Layout Side by Side Comparison**

The information in this presentation is confidential and considered proprietary to Palmetto GBA.

Manufacturer Dispute Invoices

The CGDP Portal provides Manufacturers with the ability to review dispute filings and their subsequent decisions rendered by CMS.

In the Portal, there are three tabs that assist Manufacturers with the dispute process. In order, they are:

- The Disputes tab allows Manufacturers the ability to review accepted or rejected return files and upheld or denied resolution files
- The Dispute Builder tab provides functionality for Manufacturers to create dispute files from data files received for the current quarter
- The Dispute Submission tab provides Manufacturers the ability to submit dispute files, either created in the Portal by the Dispute Builder functionality or dispute files created manually from data files received, for the current quarter and review the dispute file submission statuses of *Passed* or *Failed*

Manufacturer Disputes Tab

The Manufacturer Disputes tab contains five regions:

1) The <u>Tabbed region</u> displays the active tab

2) The <u>Filter region - Disputes</u> allows filtering of disputes by selected criteria

3) The <u>Current Cutoff Calendar region</u> provides pertinent reporting period dates

4) The <u>Return File region</u> displays Accepted and Returned dispute return files

5) The <u>Resolution File region</u> displays Upheld and Denied dispute resolution files

Detailed instructions for reviewing dispute return and resolution files reside in the CGDP Manufacturer Portal Direct Payment Process (DPP) Users Guide.

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Manufacturer Dispute Builder Tab

The Manufacturer Dispute Builder tab contains seven regions:

1) The <u>Tabbed region</u> displays the active tab

2) The <u>Selection Criteria Form button</u> (displaying as the Click here to add data line items button) opens the Selection Criteria form to add PDE line items to dispute files

3) The <u>Current Cutoff Calendar region</u> provides pertinent reporting period dates

4) The <u>PDE Line Item region</u> displays PDE line items selected via the Selection Criteria Search form

5) The <u>Save button</u> saves files that have been loaded to the PDE Line Item region

6) The Delete All button will delete all PDE line item files that have been loaded to the PDE Line Item region

7) The Complete Dispute File button will complete the dispute file for a specific P Number and send it to the Dispute Submission page in the Portal

Detailed instructions for creating dispute files via the Dispute Builder functionality reside in the CGDP Manufacturer Portal Direct Payment Process (DPP) Users Guide.

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Manufacturer Dispute Submission Tab

The Manufacturer Dispute Submission tab contains four regions:

1) The Tabbed region displays the active tab

2) The Upload Disputes Files region allows searching for manually created dispute files for loading to the Portal for submission

3) The Current Cutoff Calendar region provides pertinent reporting period dates

4) The Submitted Disputes region displays dispute files loaded to the Portal and provides statuses of each file as they progress through TPA edit processing

Detailed instructions for dispute file submission resides in the CGDP Manufacturer Portal Direct Payment Process (DPP) Users Guide.

Manufacturer Disputes Appeals

For denied disputes, Manufacturers can submit appeal requests to the independent review entity (IRE).

- Manufacturers can appeal within 30 days of receiving the decision reported with the dispute resolution file or 60 days after filing the dispute, if no decision has been reached, whichever date is earlier
- The IRE must provide a decision within 90 days of receiving the appeal
- Manufacturers can appeal the IRE decision to the CMS Administrator

Additional Dispute Information Dispute Appeals

Documentation to assist with dispute appeals can be located on the http://tpadministrator.com website under the following links:

- **Coverage Gap Discount Program Appeals Portal**
- **Manufacturer Dispute Submission and Attachment Overview**

CONTACTING THE TPA

PALMETTO GBA.

A CELERIAN GROUP COMPANY

Coverage Gap Discount Program (CGDP)

Contacting the TPA

- TPA Website – http://tpadministrator.com
  - Phone
    - Help Line: **1 (877) 534-2772 Option 1**
    - Help Line Hours: **Monday through Friday 8:00 am until 7:00 pm EST**

- General email inquiries regarding the invoicing and payment process should be sent to
  - tpaoperations@tpadministrator.com

- Webinar Training
  - Suggestions for webinar topics should be sent to webinar@tpadministrator.com
  - Previous webinar slides are posted to the TPA website

- Questions regarding Disputes, EFT information and invoice corrections can be located on the TPA website
  - http://tpadministrator.com

Resources

- Medicare Drug Benefit and C & D Data Group
  - Manufacturers Agreement, Changes of Ownership (CHOW), Terminations, Compliance/Administrative-related Issues, and Policy related questions
  - Email
    - CGDPandManufacturers@cms.hhs.gov

- Discount Program Manufacturer's Page
  - Website
    - https://www.cms.gov/medicare/prescription-drug-coverage/prescriptiondrugcovgenin/index.html

- Independent Review Entity (IRE) for Discount Program appeals
  - Website
    - https://cgdpappeals.provider-resources.com

Resources (continued)

- HPMS Website Updating CMS contact and labeler code changes
  - Website
    - https://hpms.cms.gov
  - CMS HPMS Password Resets (CMS Passwords must be reset every 60 days via CMS EUA system)
    - CMS EUA Password Reset: https://eua.cms.gov
    - CMS IT Service Desk phone: 1 (800) 562-1963 or 1 (410) 786-2580
    - CMS IT Service Desk email: CMS_IT_service_desk@cms.hhs.gov

  - CMS HPMS Non-Password access assistance
  - Email:
    - CMSHPMS_access@cms.hhs.gov

Onboarding Training Questions

Questions?

Send an email to tpaoperations@tpadministrator.com with your questions.