

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



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Palmetto GBA
Columbia, South Carolina

Third Party Administrator (TPA) for CMS

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

PROGRAM OVERVIEW

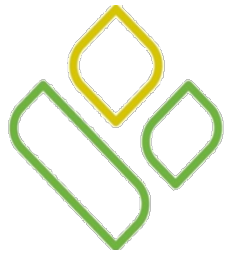


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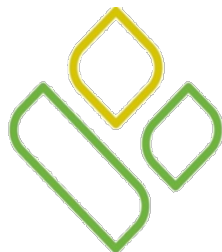
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Third Party Administrator (TPA) for CMS



Program Overview

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



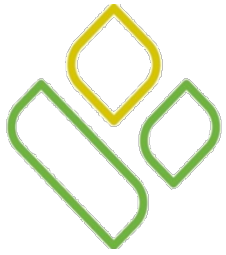
Coverage Gap Discount Flow

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

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

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

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



Invoice Distribution Schedule

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

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

SPONSOR CONNECTIVITY



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Third Party Administrator (TPA) for CMS



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

DRUG MANUFACTURER CONNECTIVITY



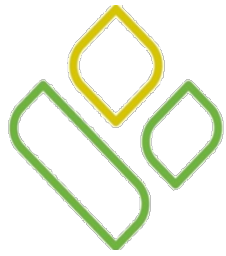
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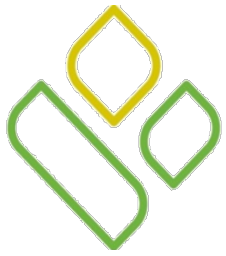
Third Party Administrator (TPA) for CMS

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



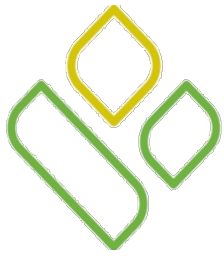
Connectivity for Drug Manufacturers - via Secure FTP

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



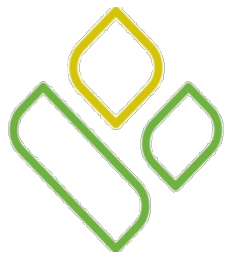
Configure TPA Firewall Rules to Accept a Connection From Your IP address

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



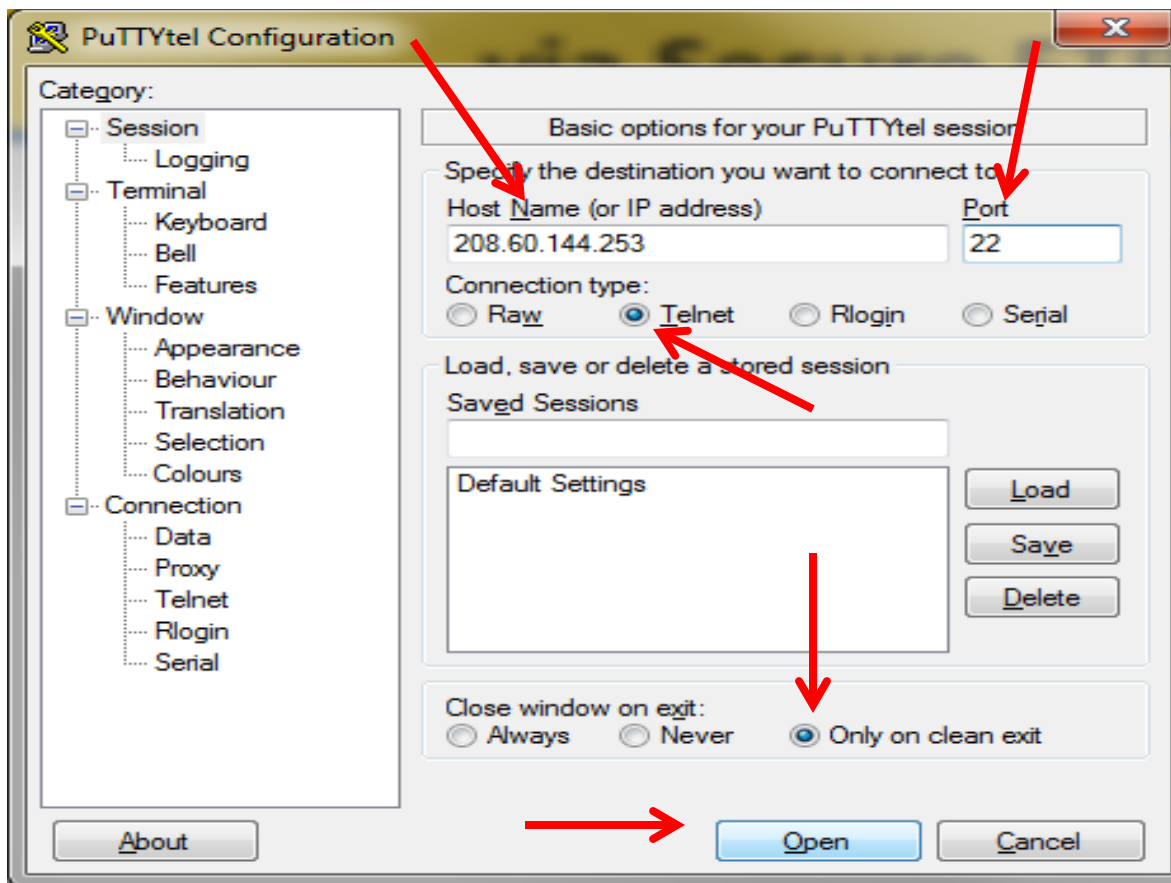
Test Your Connection via a Telnet Session

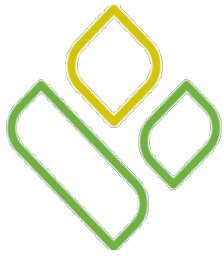
- Once the IP Address has been loaded by the TPA, you will be notified and asked to perform a Telnet test to verify that the firewall security settings are correct
- The TPA recommends using the Putty Telnet utility to perform this test
 - Go to:
<http://www.chiark.greenend.org.uk/~sgtatham/putty/download.html>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



Test Your Connection via a Telnet Session

- Enter the following information

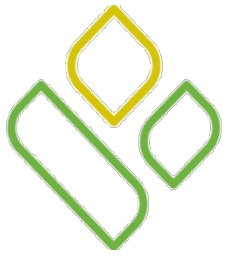




Test Your Connection via a Telnet Session

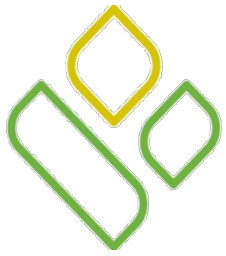
- Successful Telnet test should generate the following

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



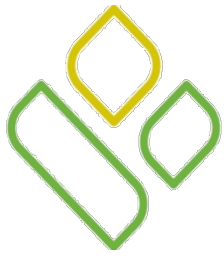
Generate a Public / Private Pair of Keys for Authentication

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



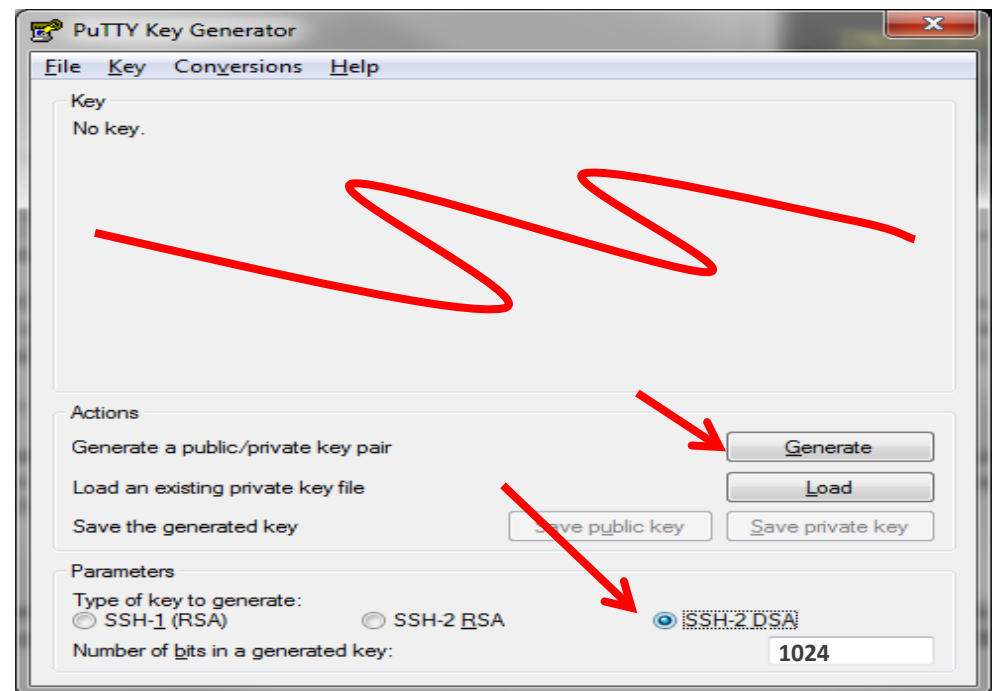
Generate a Public / Private Pair of Keys for Authentication

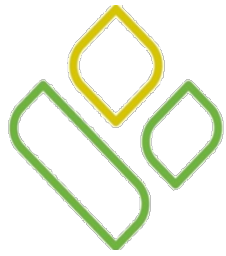
- The TPA recommends using the Putty Key Generation utility to create your keys
 - Go to:
<http://www.chiark.greenend.org.uk/~sgtatham/putty/download.html>
 - Then click on the following:
 - PuTTYgen: puttygen.exe



Generate Keys & Have TPA Load Your Public Key

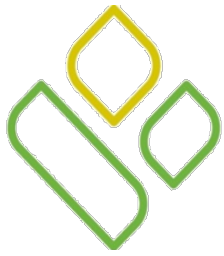
- Click the “SSH-2 DSA” radio button
- Click “Generate”
- Move cursor around in the blank grey area to move the process faster
- Save public key as .pub and private key as .ppk
- Provide the public key to the TPA
- Once the public key has been loaded, you are ready to connect your SFTP client





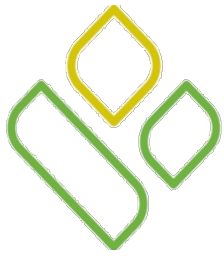
A Note About Choosing an SFTP Client

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



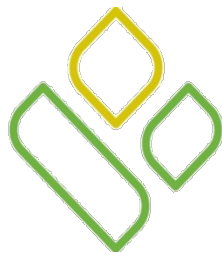
Load Your Private Key Into Your SFTP Client – Using FileZilla

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



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

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



Sample FileZilla Connection

filezilla@127.0.0.1 - FileZilla

File Edit View Transfer Server Bookmarks Help

Host: 127.0.0.1 Username: filezilla Password: Port: Quickconnect

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

Local site: C:\dev\svn\FileZilla3\src\interface\resources\16x16\ Remote site: /16x16\

Local site contents: resources, .svn, 16x16, 32x32, 48x48, blukis

Remote site contents: 16x16, .svn, c, FileZilla3, foo

Filename	Filesize	Filetype	Last modified
auto.png	577 B	Portable Network Graphics	2009-03-11 15:51:12
binary.png	519 B	Portable Network Graphics	2009-03-11 15:51:12
bookmark.png	296 B	Portable Network Graphics	2009-03-11 15:51:12
cancel.png	155 B	Portable Network Graphics	2009-03-11 15:51:12
compare.png	124 B	Portable Network Graphics	2009-03-11 15:51:12
disconnect.png	238 B	Portable Network Graphics	2009-03-11 15:51:12
download.png	143 B	Portable Network Graphics	2009-03-11 15:51:12
downloadadd.png	174 B	Portable Network Graphics	2009-03-11 15:51:12
file.png	258 B	Portable Network Graphics	2009-03-11 15:51:12
filezilla.png	477 B	Portable Network Graphics	2009-03-11 15:51:12

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

Selected 1 file. Total size: 174 B

Server/Local file Direction Remote file

filezilla@127.0.0.1			
C:\dev\svn\FileZilla3\src\bin\FileZilla_unicode_dbg.exe	-->	/FileZilla_unicode_dbg.exe	3.473.408 bytes (267.1 KB/s)
C:\dev\svn\FileZilla3\autom4te.cache\output.2	-->	/FileZilla3/autom4te.cache/output.2	633,8 KiB Normal Transferring
C:\dev\svn\FileZilla3\autom4te.cache\requests	-->	/FileZilla3/autom4te.cache/requests	24,0 KiB Normal

Queued files (3566) Failed transfers Successful transfers

Queue: 558 MiB

REPORTS

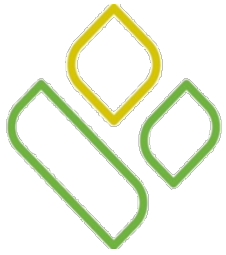


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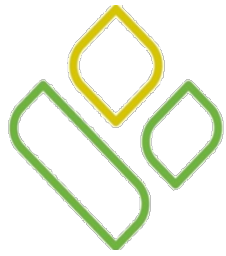
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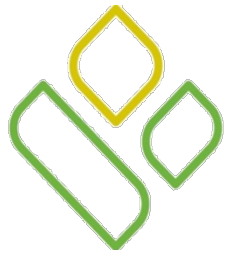
Summary / Invoice Report

- Distributed quarterly to Drug Manufacturers and Sponsors
- Positive amounts summarize the payment Sponsors should expect to receive from each Drug Manufacturer
- Negative amounts summarize the payment Drug Manufacturers should expect to receive from each Sponsor due to adjusted or deleted PDEs during the previous quarters
- Also used to create a Payment Confirmation Report that is sent back to the TPA when using the flat file method



Detail / Data Report

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



Tracking Report

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

MAKING PAYMENTS

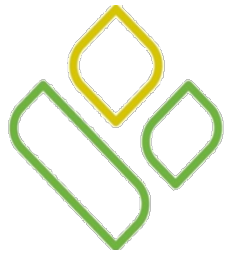


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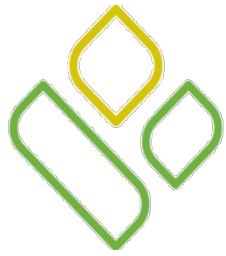
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Third Party Administrator (TPA) for CMS



Making Payment

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



Making Payment (continued)

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

CONFIRMING PAYMENTS

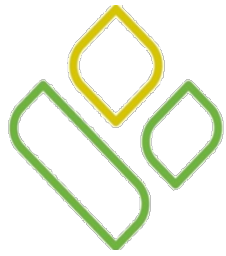


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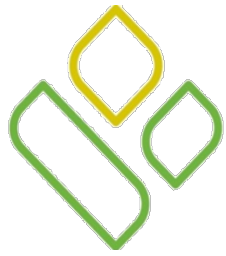
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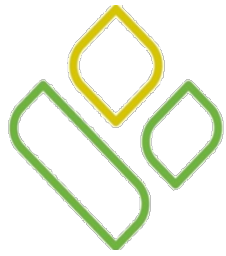
Confirming Payment

- Must confirm payments made and payments received and on what date
- Convert the Invoice into a Payment Confirmation Report if using the flat file method
- Drug Manufacturers
 - Mailbox (Flat file via Secure FTP)
 - Manufacturer Portal (web based)
 - Available by going to TPAOperations.com > Quarterly Invoices > Access Manufacturer Portal
 - Reference the Manufacturer Payment Confirmation User Guide posted on the homepage for instructions on how to use this method
 - Third Party Vendor
- Plan sponsors
 - Sponsor Portal (Flat file via web based password authentication)
 - Sponsor Portal (web based)
 - Available by going to CSSCOperations.com > Prescription Drug Event > Coverage Gap Discount Program (CGDP) > Access CGDP Mailbox
 - Reference the Sponsor Payment Confirmation User Guide posted on the homepage for instructions on how to use this function
 - NDM



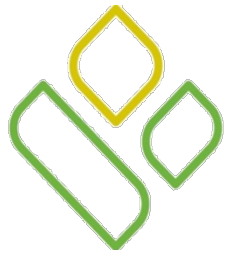
Confirming Payment

- If you elect to use the flat file method, the invoice must be edited to become a Payment Confirmation Report and serve as the input file
 - Manufacturer file layout exists on the TPA website TPAdministrator.com
 - Quarterly Invoices
 - Side by Side Comparison of Invoice Payment Confirmation
 - Sponsor file layout exists on the CSSC website CSSCOperations.com
 - Prescription Drug Event
 - Coverage Gap Discount Program (CGDP)
 - Sponsor Side by Side Comparison CONTSUM VS. CONFIRM
- Confirmations due within 5 business days after making payment, or before the deadline (whichever date is sooner)



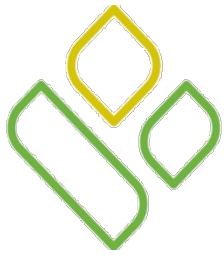
Payment Confirmation for Drug Manufacturers - via Secure FTP

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



Payment Confirmation for Drug Manufacturers - via Manuf. Portal

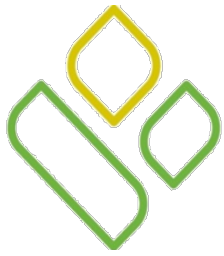
- A Web based tool for creating, editing and submitting payment confirmations
 - No need to edit flat files and submit via SFTP
- Readable invoice summary
 - Also provides a list of payments to be made, including EFT ID
- Accessible via a new, secure Manufacturer's Portal
- Manufacturers can choose to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



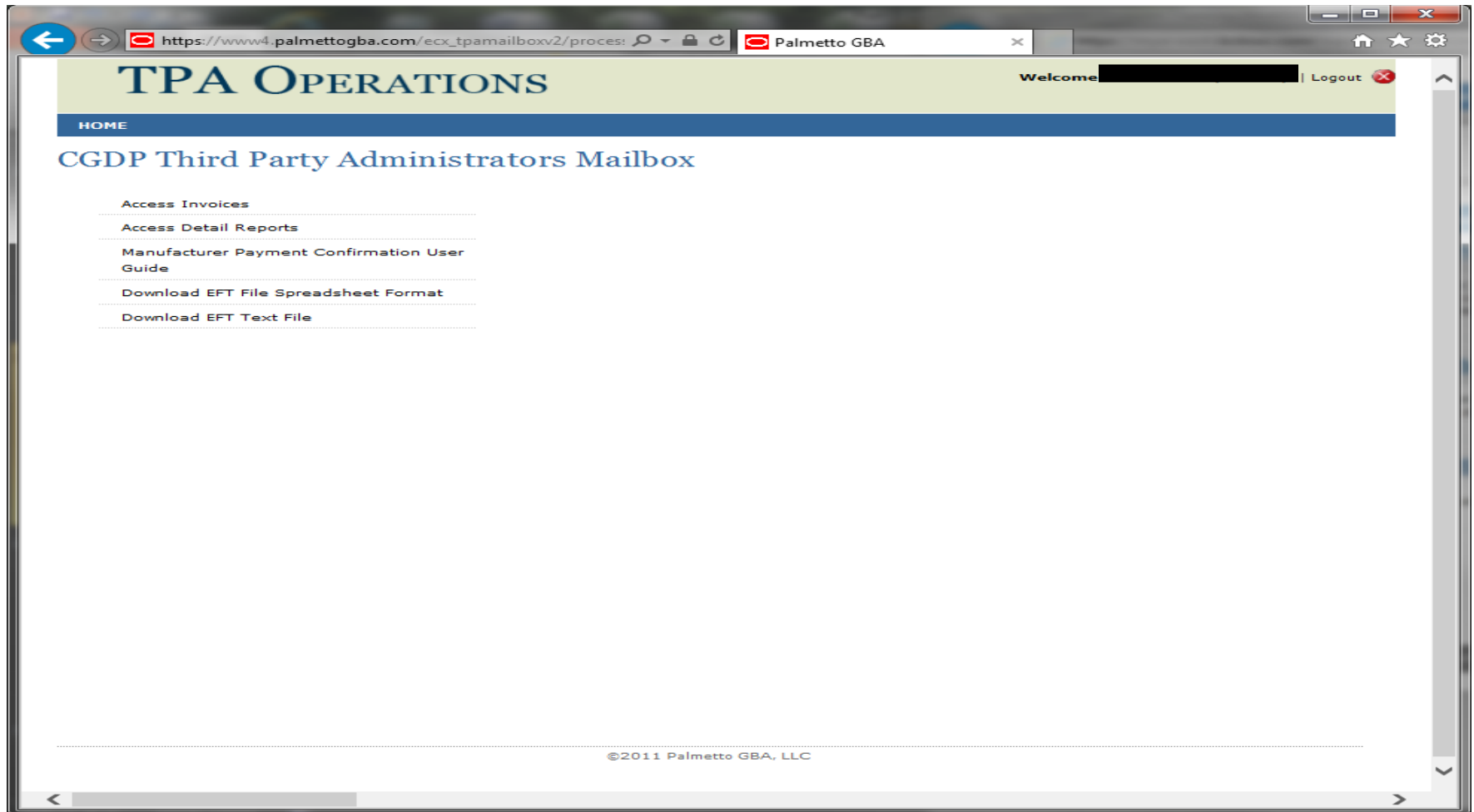
Payment Confirmation for Drug Manufacturers - via Manuf. Portal

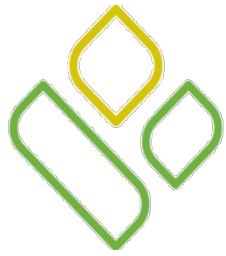
- Login by going to TPAdministrator.com
- Quarterly Invoices
- Access Manufacturer Portal
- Use the login credentials provided by the TPA
- Reference the Manufacturer Payment Confirmation User Guide for assistance

The screenshot shows a web browser window with the URL https://www4.palmettogba.com/ecx_tpamailboxv2/. The page title is "Palmetto GBA". The main heading is "TPA OPERATIONS" in a large, bold, blue font. Below it, the subheading is "Coverage Gap Discount Program TPA Mailbox" in a smaller, blue font. In the center of the page is a "USER LOGIN" box. This box contains two input fields: "User ID" and "Password". Below these fields is a red "Login" button. At the bottom of the page, there is a small copyright notice: "©2011 Palmetto GBA, LLC".



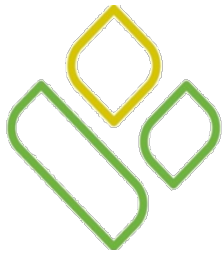
Drug Manufacturer Portal Interface





Login- via Sponsor Portal

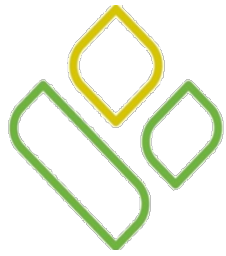
- User ID is the contract number
- The point of contact is sent a temporary password and should maintain the permanent password
- All CGDP files are delivered to this Portal and the Payment Confirmation Report is also sent here
 - Excluded is the annual CGDP Reconciliation report (PRS), which is separately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



Payment Confirmation for Sponsors - via Sponsor Portal

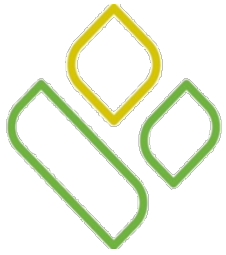
- www.csscooperations.com
- Prescription Drug Event
- Coverage Gap Discount Program (CGDP)
- Access CGDP Mailbox

The screenshot shows a web browser window with the address bar displaying https://www4.palmettogba.com/ecx_tpamailboxv2/. The page has a header with the text "TPA OPERATIONS" in a large, blue, serif font. Below the header, the text "Coverage Gap Discount Program TPA Mailbox" is displayed in a smaller, blue, serif font. In the center of the page, there is a "USER LOGIN" form. The form has a blue header with the text "USER LOGIN" in white. Below the header, there are two input fields: "User ID" and "Password". To the right of the "Password" field is a red "Login" button.



Sponsor Interface





Payment Confirmation for Sponsors - via Confirm Invoice feature

- Reference the Sponsor Payment Confirmation User Guide for assistance

TPA OPERATIONS

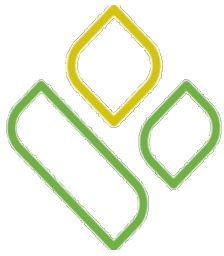
HOME

CGDP Third Party Administrators Mailbox

Access Sponsor Mailbox

Confirm Invoice

Sponsor Payment Confirmation User
Guide



Sponsor Download File

(Files sent from the TPA to the Sponsor)

TPA OPERATIONS

HOME

CGDP Third Party Administrators Mailbox

Access Sponsor Mailbox

Confirm Invoice

Sponsor Payment Confirmation User
Guide

TPA OPERATIONS

HOME

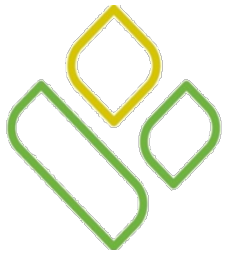
Download File

Displaying 1-10 of 42. [First/Prev] 1, 2, 3, 4, 5

[Next/Last]

Results Per Page : 10 ▼

Name	Description	Date	Download File
R1094181.RPT.SPON_INVOICE	SPON_INVOICE	2012-04-29	Download
R8464583.RPT.SPON_RESP	SPON_RESP	2014-03-19	Download
R8464582.RPT.SPON_RESP	SPON_RESP	2014-03-19	Download
R0561442.RPT.SPON_RESP	SPON_RESP	2014-02-25	Download
R0561442.RPT.SPON_RESP	SPON_RESP	2014-02-10	Download
R0561440.RPT.SPON_RESP	SPON_RESP	2014-02-10	Download
R0535886.RPT.SPON_RESP	SPON_RESP	2014-02-10	Download
R9433702.RPT.SPON_TRACKING_201304	SPON_TRACKING_201304	2014-01-30	Download



Sponsor Upload File – Flat File Method

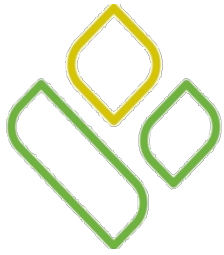
- Map to local drive where the file to be uploaded has been saved and then click the submit button

The screenshot shows a web browser window with the URL https://www4.palmettogba.com/ecx_tpamailbox2/initUserFile. The page displays a table of files and a file upload section at the bottom.

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

Upload File

File Name :



Sponsor Upload History – Flat File Method

Browser address bar: https://www4.palmettogba.com/ecx_tpamailboxv2/ | Palmetto GBA

TPA OPERATIONS

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HOME

Download File

Displaying 1-10 of 42. [First/Prev] 1, 2, 3, 4, 5 [Next/Last] Results Per Page: 10

Name	Description	Date	Download File
R1094181.RPT.SPON_INVOICE	SPON_INVOICE	2012-04-29	Download
R8464583.RPT.SPON_RESP	SPON_RESP	2014-03-19	Download
R8464582.RPT.SPON_RESP	SPON_RESP	2014-03-19	Download
R0561442.RPT.SPON_RESP	SPON_RESP	2014-02-25	Download
R0561442.RPT.SPON_RESP	SPON_RESP	2014-02-10	Download
R0561440.RPT.SPON_RESP	SPON_RESP	2014-02-10	Download
R0535886.RPT.SPON_RESP	SPON_RESP	2014-02-10	Download
R9433702.RPT.SPON_TRACKING_201304	SPON_TRACKING_201304	2014-01-30	Download
R0530623.RPT.SPON_Test_201302	SPON_TEST_201302	2013-10-24	Download
R0530623.RPT.SPON_Test_201302	SPON_TEST_201302	2013-10-26	Download

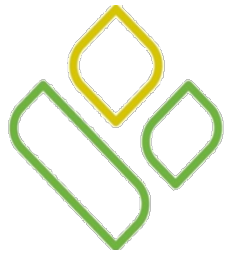
Upload File

File Name: Browse... Submit

Upload History

Displaying 1-10 of 14. [First/Prev] 1, 2 [Next/Last] Results Per Page: 10

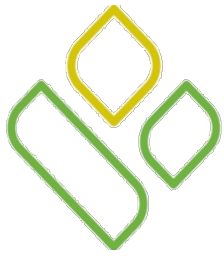
Name	Timestamp
H0000_RPT_SPON_CONFIRM.txt	2014-03-24 08:06:52.287
H0000_RPT_SPON_CONFIRM.txt	2014-03-19 07:47:12.628
H0000_RPT_SPON_CONFIRM.txt	2014-03-19 07:46:19.189
H0000_RPT_SPON_CONFIRM.txt	2014-02-10 06:20:21.368
MAB_TEST_TPAS_SPON_ELOAD_H0000.txt	2013-11-25 08:09:08.515
MAB_TEST_TPAS_SPON_ELOAD_H0000.txt	2013-11-20 16:44:50.758
Test_load_T2.txt	2013-10-28 09:05:44.815
Test_load_T2.txt	2013-10-25 10:59:59.966
R9321691.RPT.HX33_CONFIRM	2013-10-08 15:23:33.83
09042013.txt	2013-09-27 09:05:48.854



Confirmation Responses

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

A list of response codes is shown on the following page



Confirming Payment – Error codes for rejected Payment Confirmation Reports

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

DISPUTE PROCESS

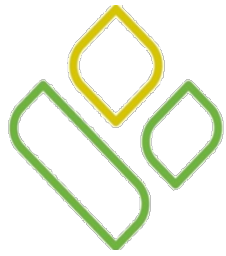


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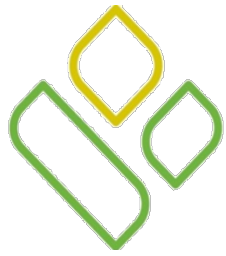
Palmetto GBA
Columbia, South Carolina

Third Party Administrator (TPA) for CMS



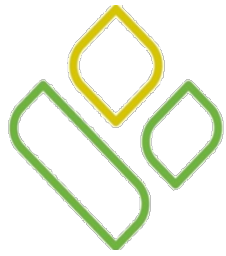
Dispute Process

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



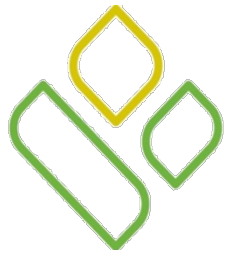
Preparing the Dispute Submission

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



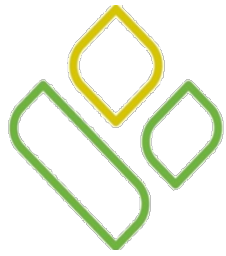
Submitting Disputes

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



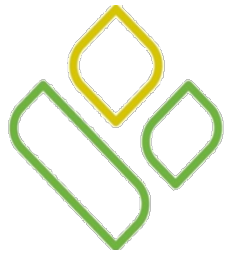
Submitting Disputes

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



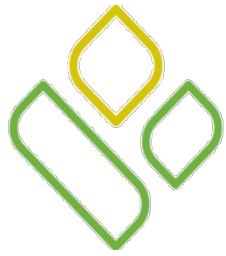
Correcting Dispute Submissions

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



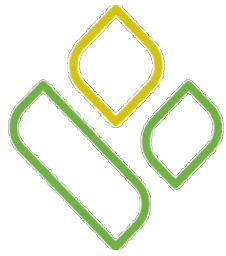
Dispute Process

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



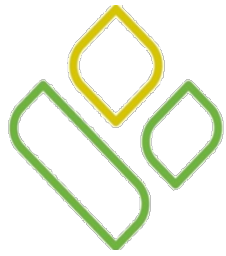
Dispute Process

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



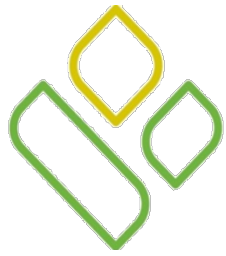
Denied Disputes

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



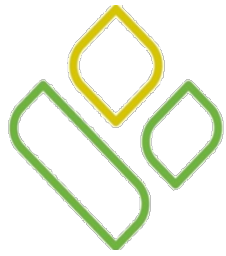
Further Dispute Information

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



Contacting the TPA

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



Additional Information

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



Resources

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