



May 2014 Manufacturer Webinar



**Angela Stanley,
CMS, Division of Payment
Reconciliation**

Agenda

- CGDP Data Overview
- CGDP Appeals
- Website and Portal Improvements
- An EFT Reminder
- Live Q&A



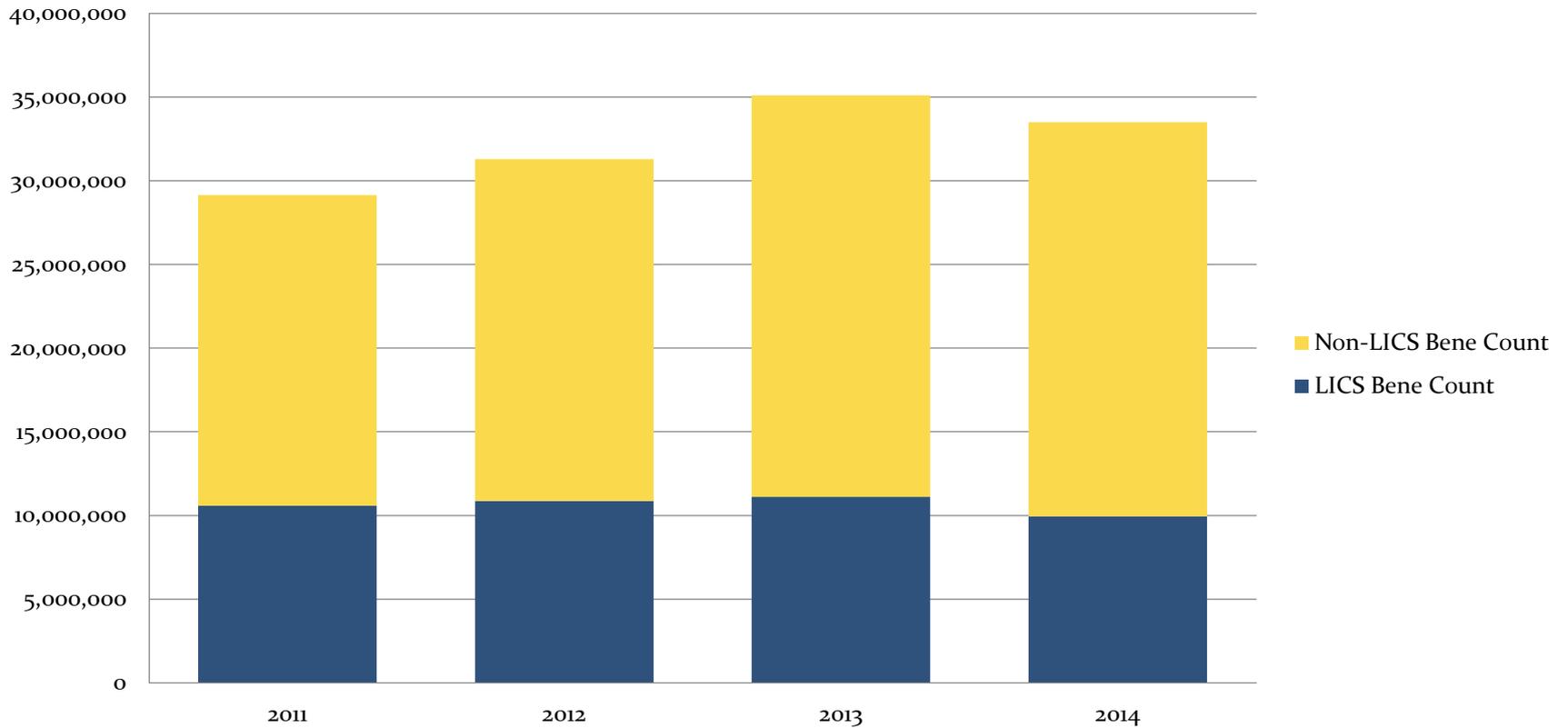
CGDP Data Overview



**Amanda Johnson,
Director, Division of Payment
Reconciliation**

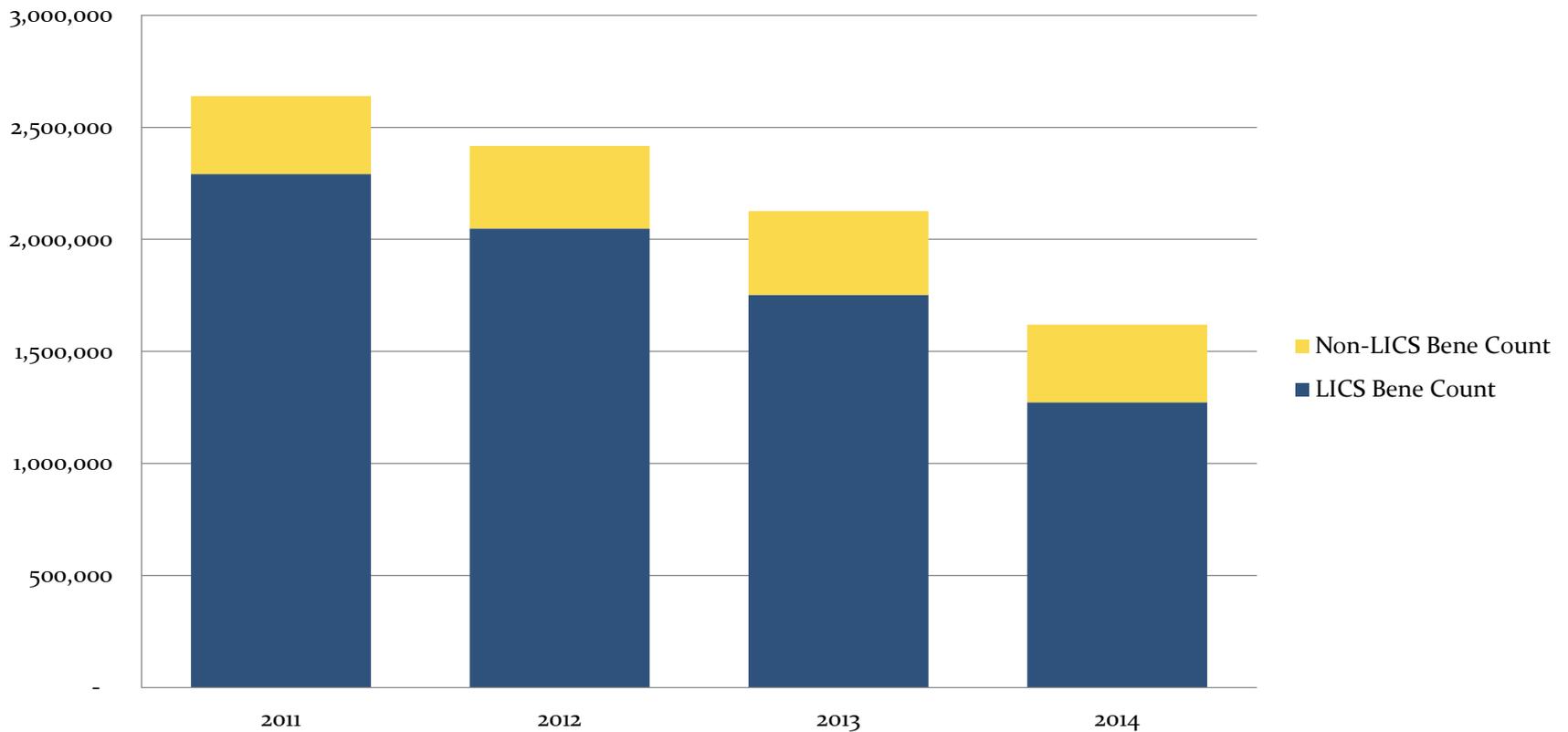
Discount Eligible Beneficiary Distribution

LICS vs Non LICS Benes Across Benefit Years



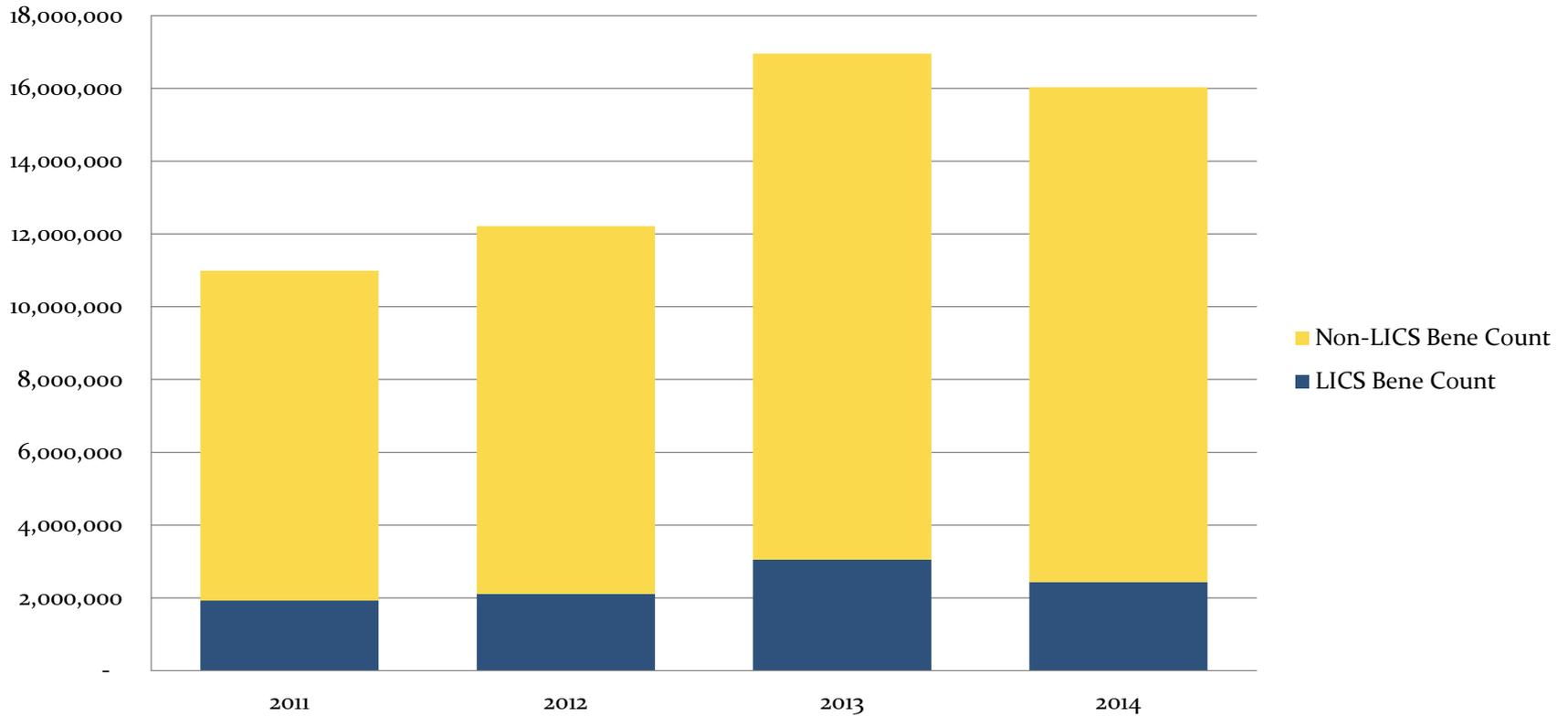
Discount Eligible Beneficiaries in Defined Standard Plans

Defined Standard Benefit Plan - LICS vs Non LICS Beneficiary Trend by Benefit Year



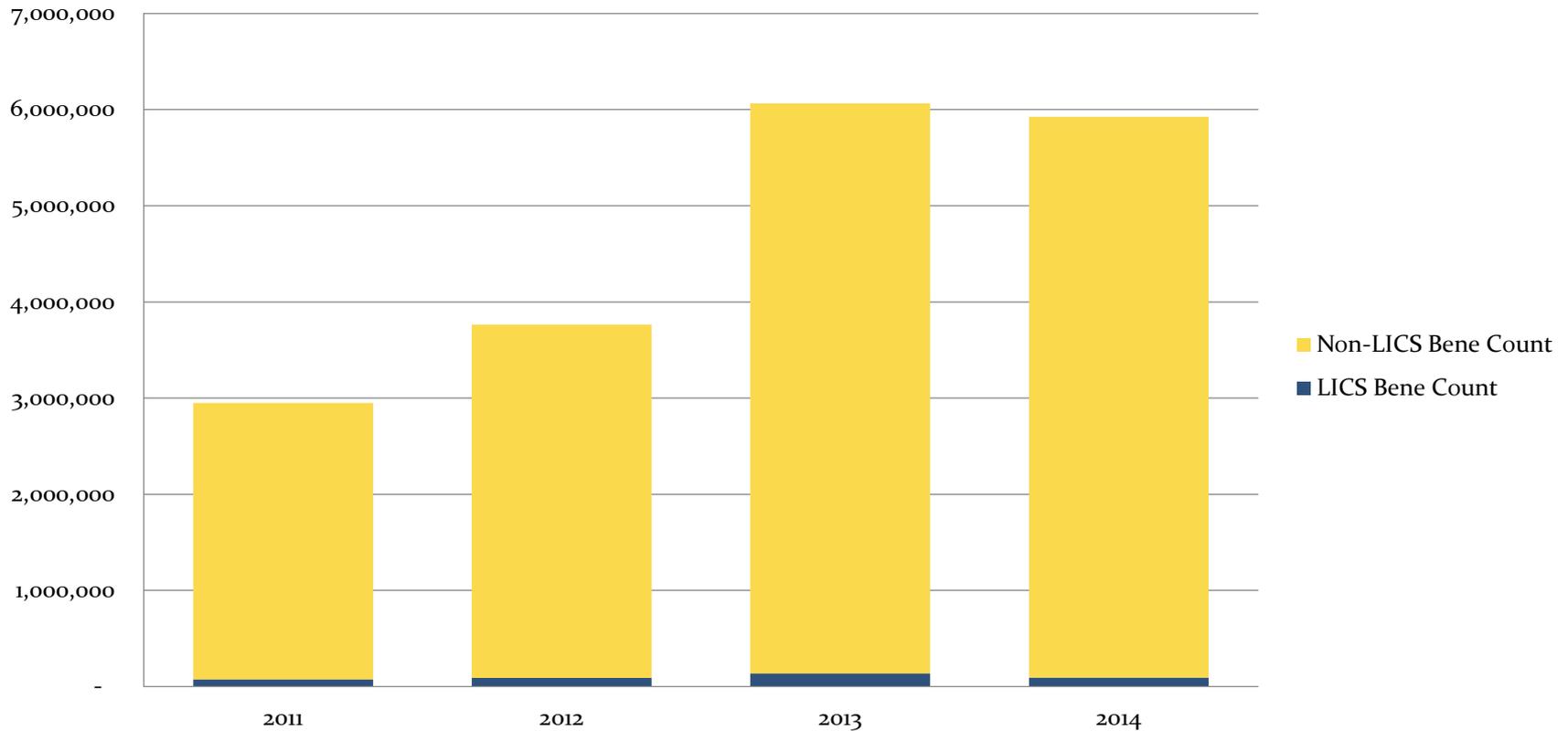
Discount Eligible Beneficiaries in Enhanced Alternative Plans

Enhanced Alternative Plan -LICS vs Non LICS Beneficiary Trend by Benefit Year

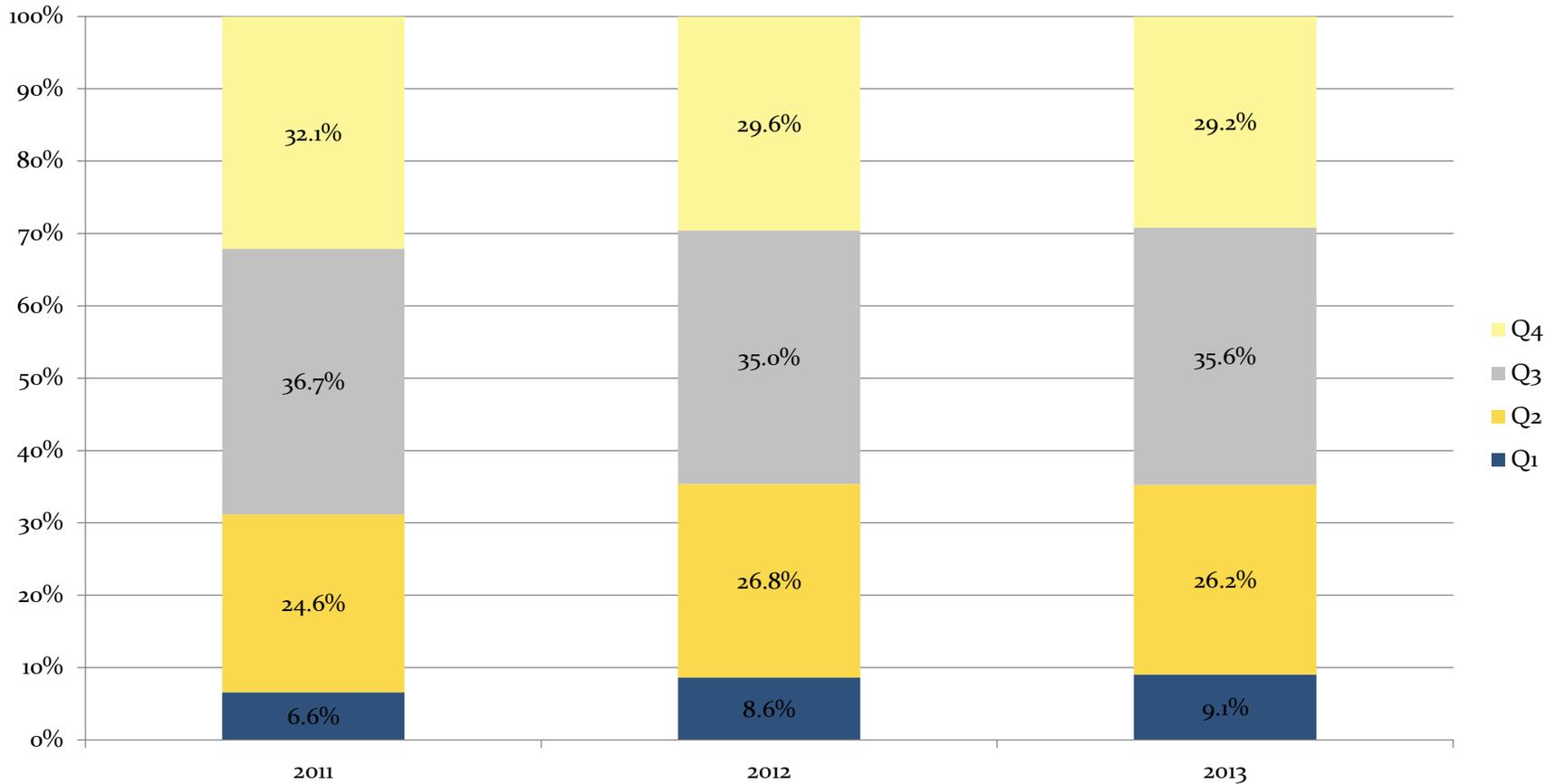


Discount Eligible Beneficiaries in Employer Group Waiver Plans

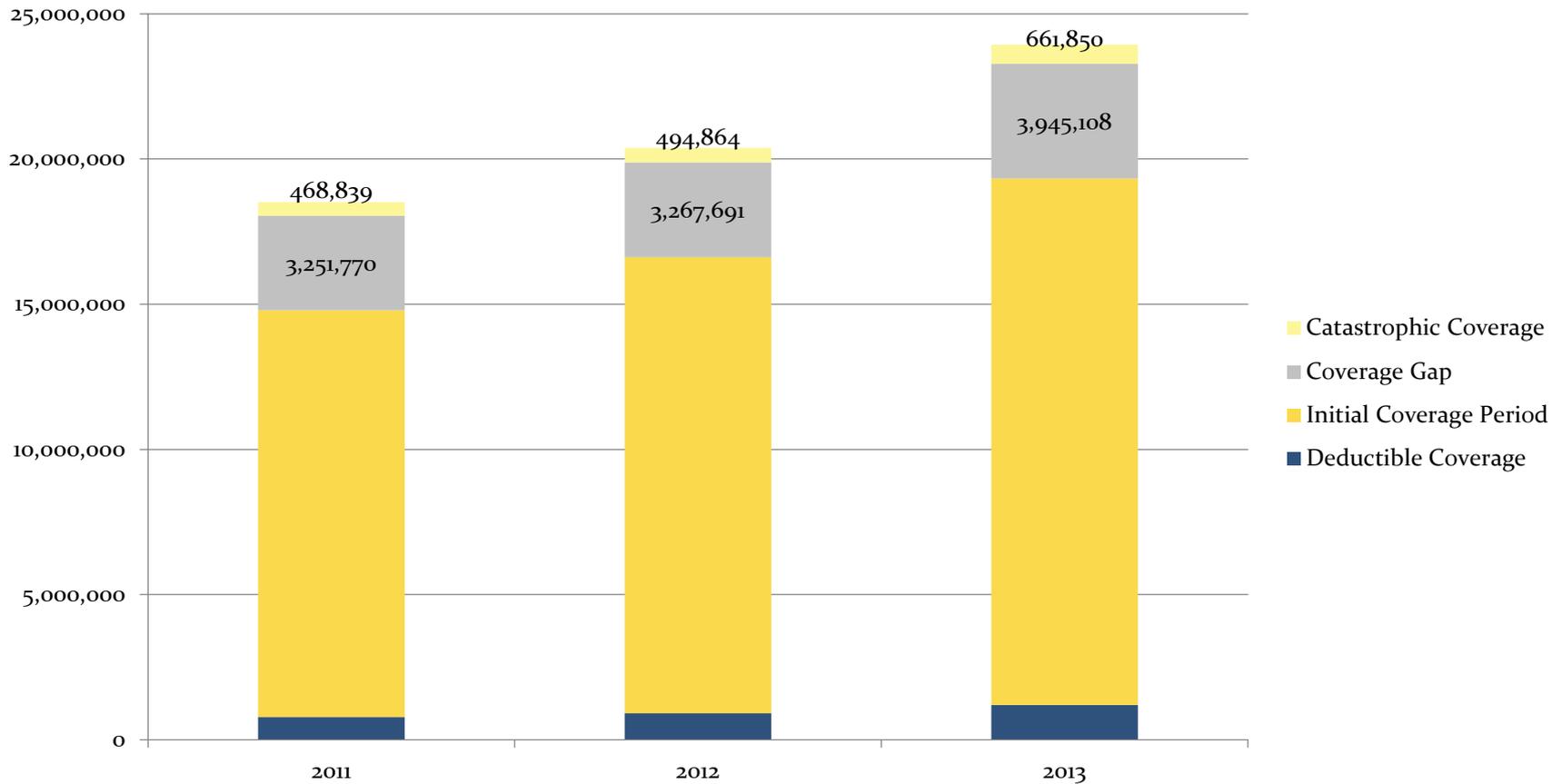
EGWP -LICS vs Non LICS Beneficiary Trend by Benefit Year



Quarter Beneficiaries Enter the Gap



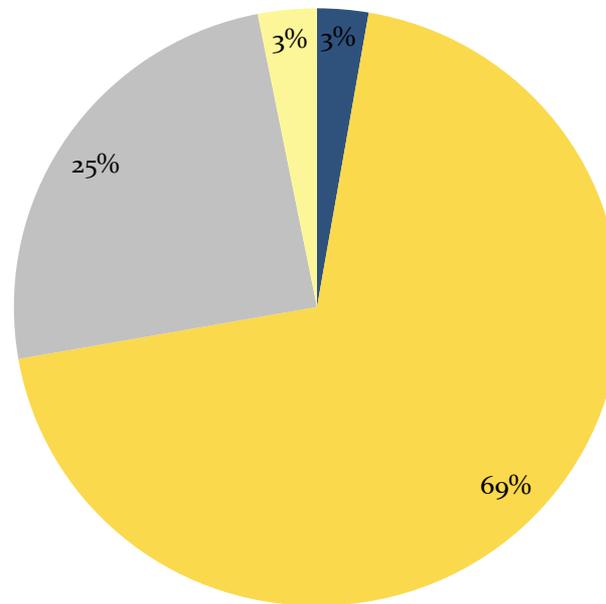
Discount Eligible Beneficiaries by Benefit Phase, Program-wide



2013 Ending Benefit Phase for EGWP Discount Eligible Beneficiaries

2013 EGWP

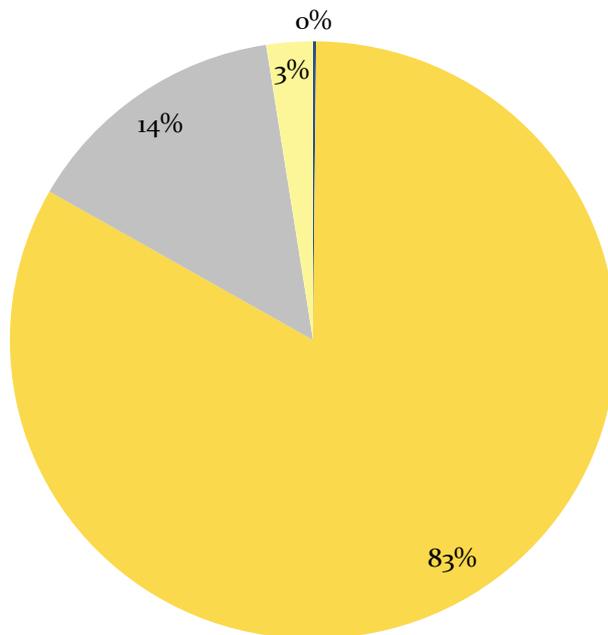
■ Deductible ■ ICP ■ Gap ■ Catastrophic



2013 Ending Benefit Phase for EA Discount Eligible Beneficiaries

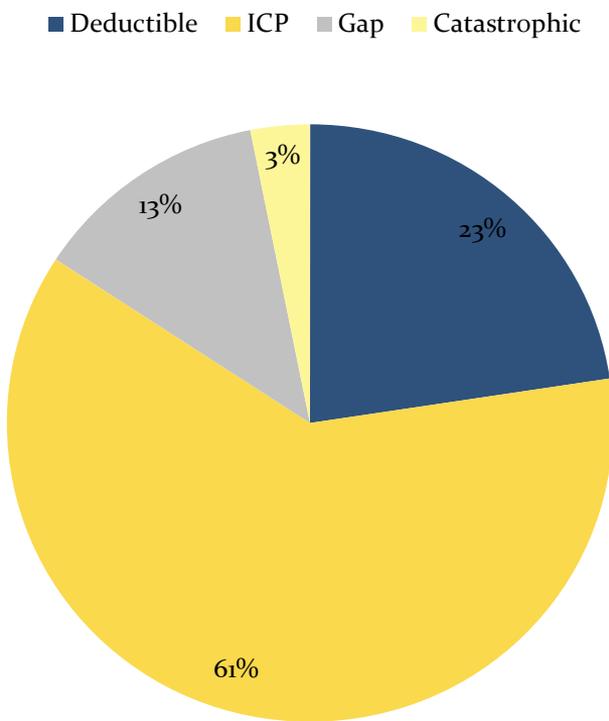
2013 Enhanced Alternative Plan

■ Deductible ■ ICP ■ Gap ■ Catastrophic



2013 Ending Benefit Phase for All Other Plan Types Discount Eligible Beneficiaries

2013 All Other Plan Types



Average Gap Discount Amount per Beneficiary

	Average Gap Discount Amount
2011	\$ 603.75
2012	\$ 705.56
2013	\$ 910.69

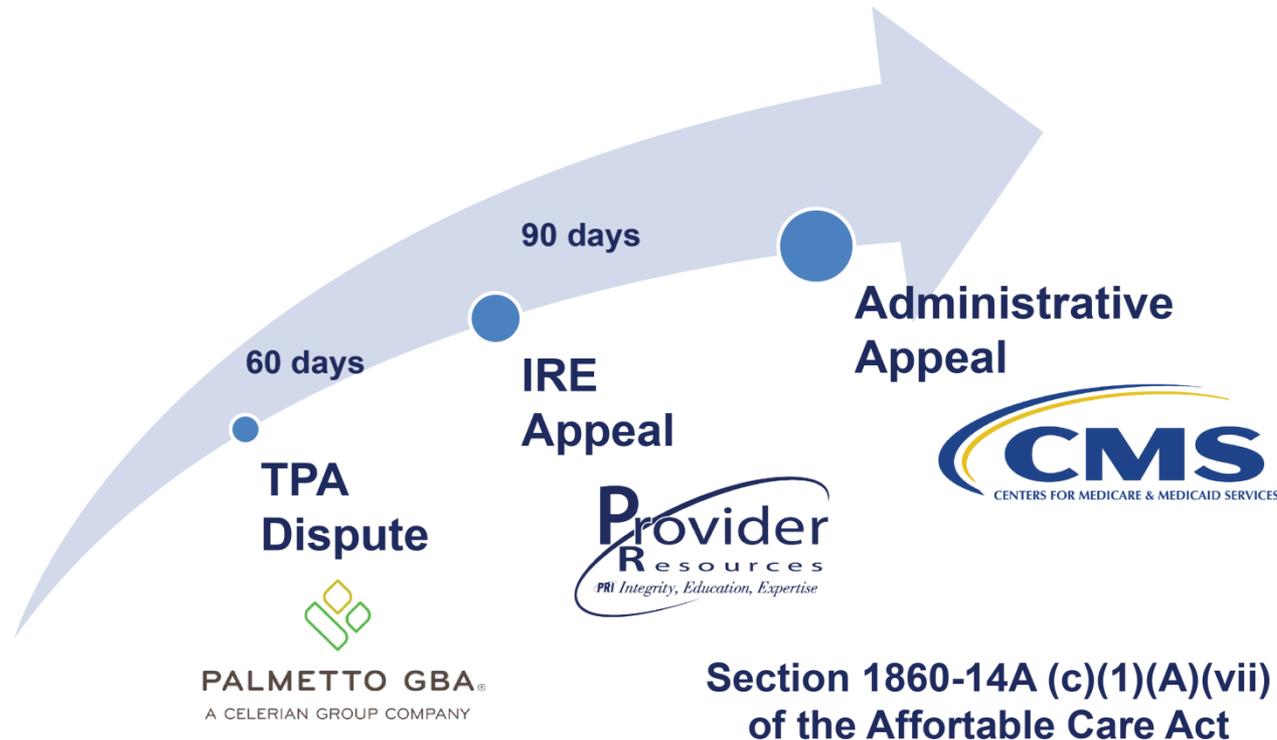


Coverage Gap Discount Program (CGDP) Appeals

Independent Review Entity (IRE)
for the Centers for Medicare and
Medicaid Services (CMS)

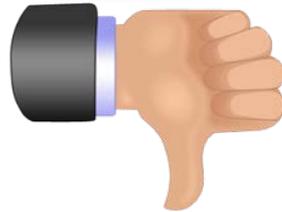
Independent Review Entity for CGDP

Review appeals of denied disputes



CGDP Appeals

- **Affirm** the appeal
 - (disagree with denial)
- **Deny** the appeal
 - (agree with denial)



File TPA Dispute Correctly

Summary of Dispute Submission Guidance by Reason Code

DISPUTE REASON CODE	DISPUTE REASON DESCRIPTION	DOCUMENTATION	COMMENTS
D01	Duplicate Invoice Item	<p>REQUIRED: The SUPPORTING DETAIL REFERENCE NUMBER field must contain the Detail Reference Number (DRN) of the potential duplicate.</p> <p>OPTIONAL: Supporting evidence in the ADDITIONAL INFORMATION field.</p>	Most PDEs disputed for this reason represent adjustments to previously invoiced items. Manufacturers should confirm that this is not the case by ensuring that the DRN from the disputed PDE and the DRN entered in the Supporting DRN field are different.
D02	Closed Pharmacy	<p>REQUIRED: The SUPPORTING DATE 1 field should contain the NCPDP closed date.</p> <p>OPTIONAL: Supporting evidence in the ADDITIONAL INFORMATION field.</p>	The date of service on the dispensing event should post-date the date entered as the NCPDP closed date.
D03	Not PART D Covered Drug	<p>REQUIRED: The ADDITIONAL INFORMATION field should contain supporting evidence explaining the statutory exclusion that applies to the drug.</p>	Manufacturers should confirm that the Service Provider ID in question does not represent a pharmacy for disputes on the basis that the drug is covered under Part B.



Know the Guidance

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850



CENTER FOR MEDICARE

DATE: March 5, 2012
TO: Pharmaceutical Manufacturers
FROM: Cheri Rice /s/
Director, Medicare Plan Payment Group
SUBJECT: Medicare Coverage Gap Discount Program—Dispute Resolution

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850



CENTER FOR MEDICARE

TO: Pharmaceutical Manufacturers
FROM: Cynthia G. Tudor, Ph.D., Director, Medicare Drug Benefit and C & D Data Group
SUBJECT: Medicare Coverage Gap Discount Program Appeals Guidance
DATE: May 31, 2011

- Not calculated correctly
- Not calculated with accurate data
- Explain why determination is incorrect

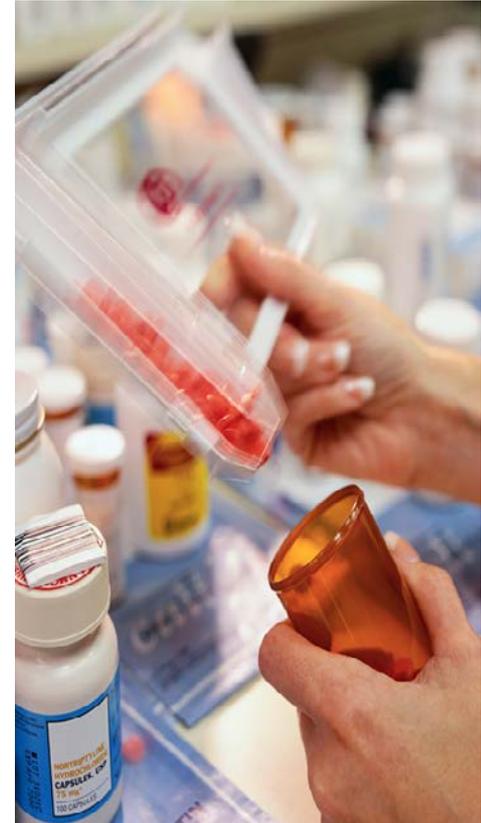
Reason Codes

- Duplicate Invoice Item
- Closed Pharmacy
- Not a Covered Part D Drug



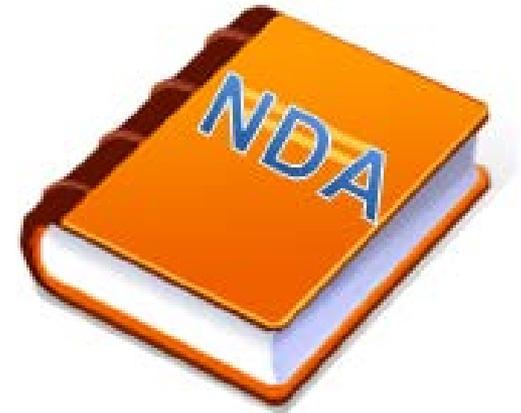
Reason Codes

- Aberrant Quantity
- High Price of the Drug
- Last Lot Expiration



Reason Codes

- Marketing Category
 - Not NDA
 - Not BLA
- Excessive Gap Discount
 - Single
 - Cumulative



Excessive Gap Discount Single Claim

2013 – TrOOP is \$4,750 and the plan covers 2.5% of negotiated drug costs

$$[(\$4,750 \div 0.975) \times 0.50]$$

2014 – TrOOP is \$4,550

2013 – Maximum discount \$2,435.90

2014 – Maximum discount \$2,333.33

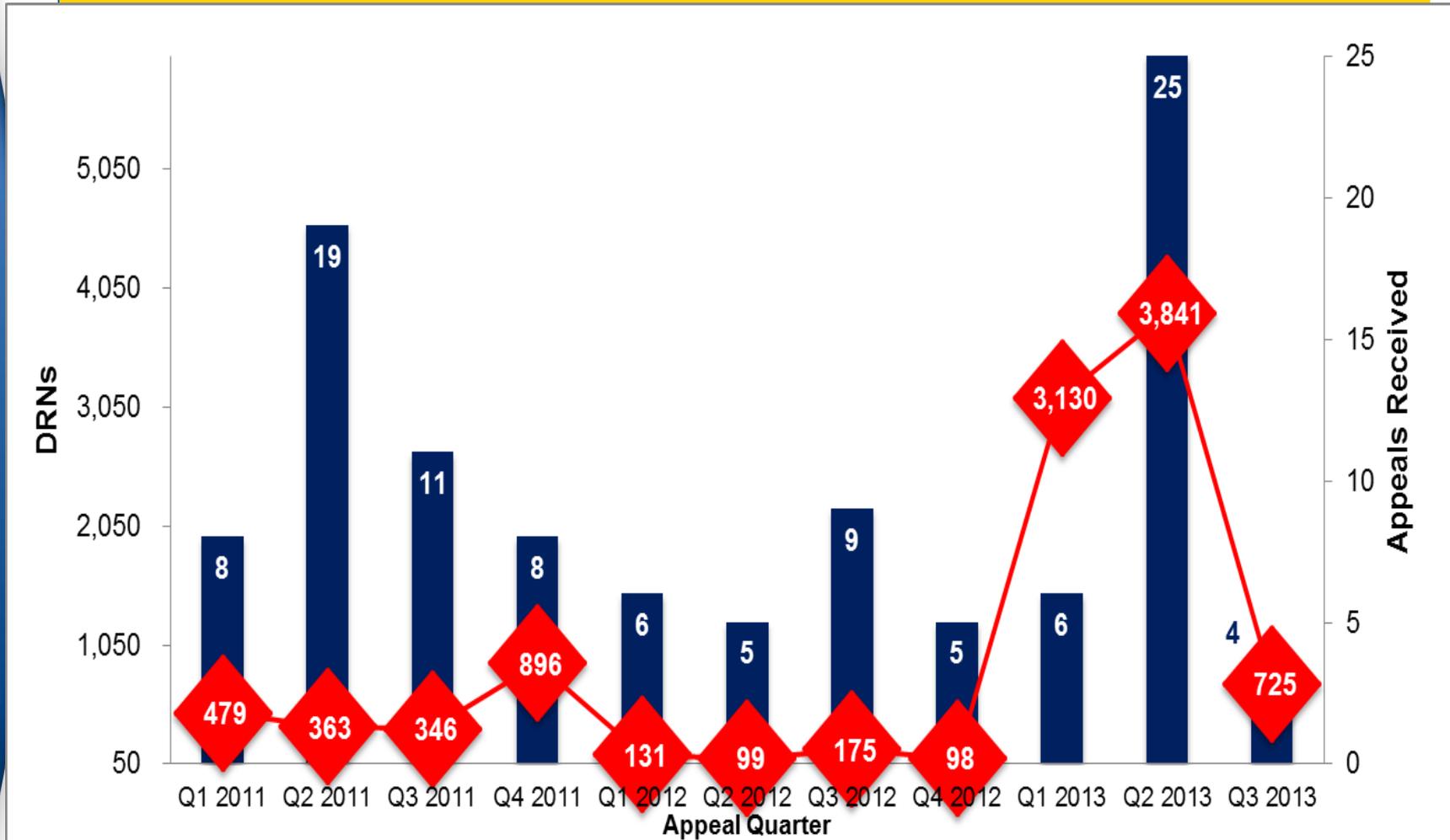
Excessive Gap Discount Cumulative Claims

Depends on secondary payers and their
TrOOP status

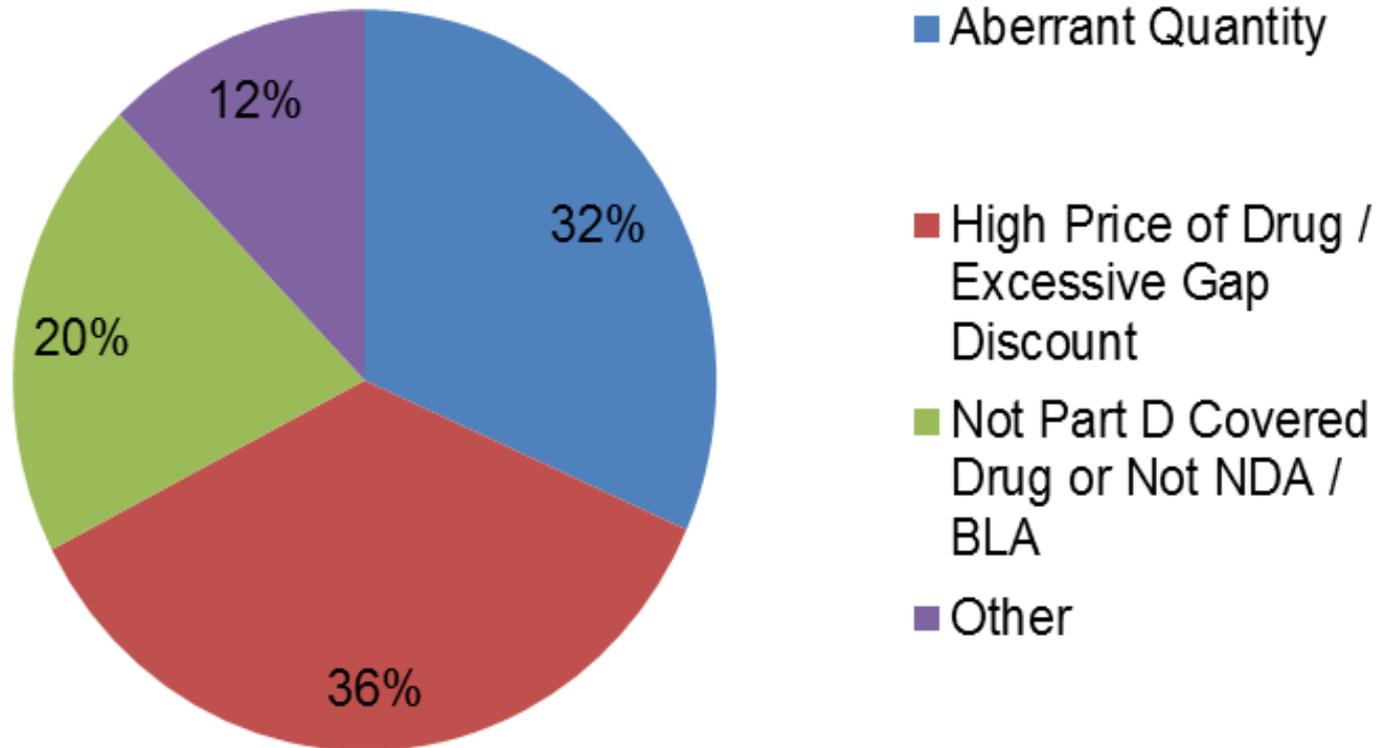
2013 - maximum discount for multiple claims
is \$4,750

2014 - decreases to \$4,550

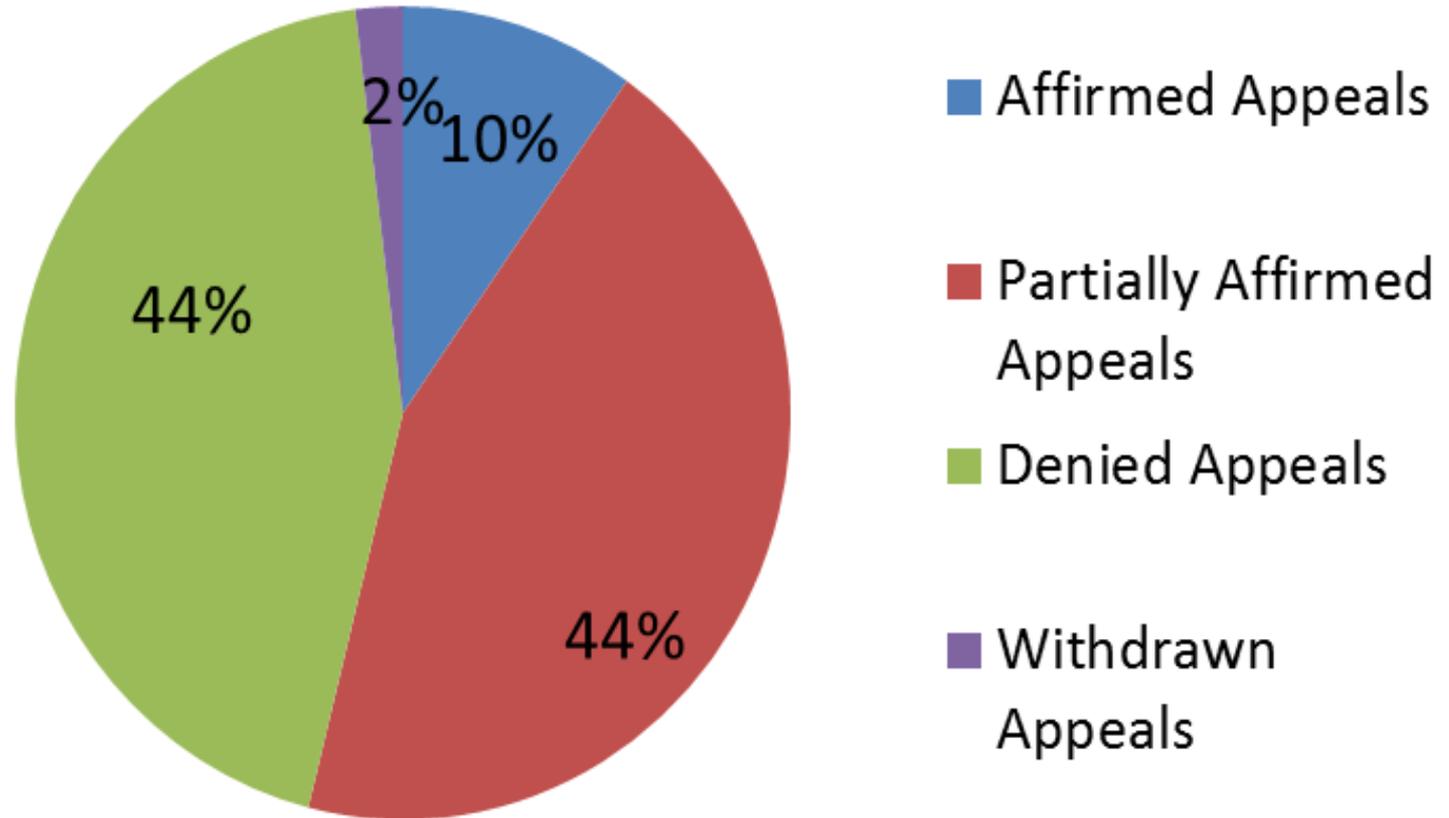
Appeals Received



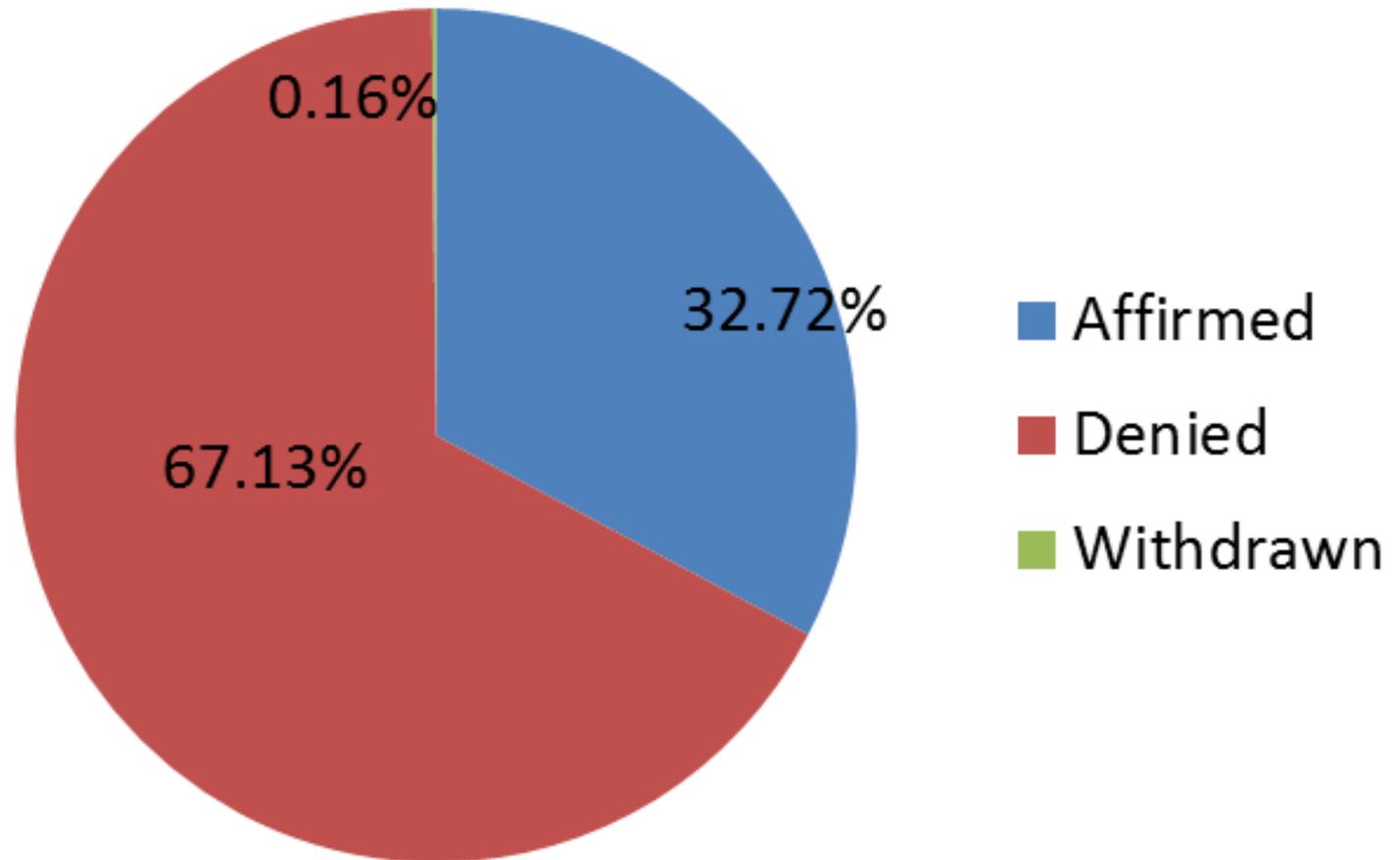
Appeals by Reason Codes



Appeal Outcomes



DRN Outcomes



Affirmed Examples

- Part D Sponsor stated the PDEs would be adjusted
 - Incorrect calculation
 - Incorrect NDC
 - Incorrect quantity
 - Incorrect data submitted
- Exceeded maximum discount
- Not Part D Covered Drug

Denied Examples

- Supporting evidence absent
 - Non covered drugs
 - Excessive gap discount
 - Inappropriate doses
 - Excessive cost
- Prior Authorization present

Conclusion

- File your dispute correctly
- File your appeal timely
- Respond to communications received from the IRE

CGDPAppeals@provider-resources.com



**CGDPAppeals@
provider-resources.com**



Website and Portal Improvements



**Art Spaziano, Manager
Palmetto GBA
Medicare Part D, CGDP TPA**

Website and Portal Improvements

- TPAdministrator.com
 - FAQ
 - ListServ Announcement History
- Manufacturer's Portal
 - Payment Confirmation
 - Support for negative amounts
 - Detail reports
 - Confirmation responses
- Sponsor Mailboxes
 - Web based payment confirmation

TPAdministrator.com

FAQ



PALMETTO GBA
A CELERIAN GROUP COMPANY



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Coverage Gap Discount Program

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CSSC Operations

Looking for CSSC Operations? Follow the link below to access the website.
www.csscoperations.com

To Access the CGDP Reconciliation Report Layouts click on the links below.

[Inputs Report](#) | [Results Report](#)

Third Party Administrator

The Third Party Administrator website is the gateway to the Coverage Gap Discount Programs. Visitors to the site can access information about the Coverage Gap Discount Program; including information regarding invoicing and payment confirmation procedures. In addition, the site provides valuable links to CMS instructions and other official resources.



News

Drug Manufacturers W9 Forms

[Drug Manufacturers W9 Forms](#)

Frequently Asked Questions

[New Frequently Asked Questions Section](#)

System Status

All systems and report distribution are current.

TPAdministrator.com

FAQ

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TPA Drug Manufacturer

Frequently Asked Questions

Need help finding what you are looking for on this page?

Select a Topic:

Please Select
[Confirmation](#)
[Mailbox](#)
[Payment](#)
[Updates](#)

New Frequently Asked Questions Section	03/26/2014
As a Drug Manufacturer using / planning to use a 3rd party to process my reports, why is the TPA asking me to set up connectivity to mailboxes?	03/20/2014
As a Drug Manufacturer, do I need to submit my payment confirmation twice; both on the Manufacturer Portal and SFTP software?	03/20/2014
As a Part D sponsor, I received a payment for this quarter but it does not belong to us. How can I refund the money back to the issuing manufacturer?	03/20/2014
As a Sponsor, how do I change the Point of Contact for the CGDP mailbox?	03/20/2014
As a Sponsor, if I receive money after the quarterly deadlines, do I need to submit an updated payment confirmation report?	03/20/2014
Can I submit more than one payment confirmation report (Sponsor or Drug Manufacturer)?	03/20/2014
During the telnet test received message "Cannot open host".	03/20/2014
How can I submit another payment confirmation report if my latest one has an "ACCEPTED" status (Sponsor or Drug Manufacturer)?	03/20/2014
How do I reset my CGDP mailbox password (Sponsor or Drug Manufacturer)?	03/20/2014
How do I sign up for email notifications (Sponsor or Drug Manufacturer)?	03/20/2014

TPAdministrator.com

ListServ Announcement History




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➔

Coverage Gap Discount Program

- CGDP Calendar
- CGDP Reconciliation
- EFT Information
- Frequently Asked Questions
- Invoice Reconciliation Information
- Listserv Announcements
- Manufacturer Disputes
- Quarterly Invoices
- Quarterly Invoices Payment Confirmation
- References
- Webinar Information

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www.csscooperations.com

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Listserv Announcements

Need help finding what you are looking for on this page?

Select a Topic: TPA / Drug Manufacturer Listservs
TPA / Plan Sponsor Listservs

Contract Dispute Resolution Reports for Benefit Year 2011 New!	04/16/2014
The Invoice Reconciliation Reports are now available! New!	04/16/2014
New Website Enhancements	04/04/2014
Manufacturer Webinar Announcement	04/02/2014
Updated Manufacturer EFT File	04/01/2014
NEW "Frequently Asked Questions" section	03/26/2014
New Detail Report feature on the Manufacturer Portal!	03/24/2014
Manufacturer EFT File Distribution	03/18/2014
CGDP Q4 2013 Payment Deadline Reminder!	02/28/2014
Important News for Quarter 4 2013 Medicare CGDP Invoices and Reports!	02/06/2014
The 2012 CGDP Reconciliation Reports are now available in the Sponsors PRS mailbox!	02/06/2014
Quarter 4 2013 Medicare Coverage Gap Discount Program Invoices and Reports!	01/31/2014
EFT File Update	01/24/2014
Manufacturer Webinar	01/24/2014
Updates to the Process for Resolving Coverage Gap Discount Program Negative Invoiced Amounts	01/23/2014
Updated CGDP Calendar	01/06/2014
EFT Cut-Off Reminder	01/02/2014
Manufacturer Webinar	12/31/2013
2014 PDE Reporting and Calculation Guidance	12/18/2013
Scheduled System Maintenance	12/11/2013
P Number to Manufacturer Crosswalk	12/09/2013
Dispute Resolution Report file layout	11/22/2013
Attention Part D Sponsors and Drug Manufacturers	11/05/2013
Manufacturer Webinar Cancellation	10/31/2013
Phase I of the Coverage Gap Discount Program Negative Invoiced Amount Reports are now available!	10/31/2013
Quarter 3 2013 Medicare Coverage Gap Discount Program Invoices and Reports are now available!	10/31/2013
EFT File Update	10/25/2013

Manufacturer's Portal

Bi-directional Pymt Confirmation

TPA OPERATIONS

Welcome Arthur Spaziano (LM62) | Logout 

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LM62 Payment Confirmations for Contract PTEST

<input type="checkbox"/>	Seq #	Contract	Amt Due/Expected	Amt Paid/Received	Pmt Date	Pmt Method	Status
<input type="checkbox"/>	0000001	H1111	\$3,073.40	\$3,073.40	04/18/2014 	ACH <input type="text" value="v"/>	
<input type="checkbox"/>	0000002	H2222	\$47.28	\$47.28	04/18/2014 	ACH <input type="text" value="v"/>	
<input type="checkbox"/>	0000003	H3333	\$95.00	\$95.00	04/18/2014 	ACH <input type="text" value="v"/>	
<input type="checkbox"/>	0000004	S0000	-\$2,727.18	-\$2,727.18	04/18/2014 	ACH <input type="text" value="v"/>	
<input type="checkbox"/>	0000005	S1111	\$2,671.67	\$2,671.67	04/18/2014 	ACH <input type="text" value="v"/>	

Confirm Selected Lines

Reset Selected Lines

Set Payment Method (All Lines): [ACH](#) | [Wire](#) | [Other](#)

Set Payment Date (All Lines):  [Update](#)

Invoice and Confirmation Totals			
Invoice Total:	\$3,160.17	Invoiced Lines:	5
Confirmation Total:	 \$0.00	Confirmed Lines:	0
Balance Total:	\$3,160.17	Discrepant Lines :	0

Reset Invoice / Start Over

Transmit Payment Confirmation File

Legend

-  Discrepant
-  Confirmed
-  Error
-  Changed

Manufacturer's Portal Detail Reports

TPA OPERATIONS

Welcome Arthur Spaziano (LM62) | Logout 

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CGDP Third Party Administrators Mailbox

[Confirm Invoice](#)

[Access Invoices](#)

[Access Detail Reports](#)



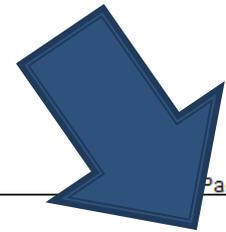
Manufacturer's Portal Confirmation Responses

Note: Once you receive an "Accepted" confirmation response, any further submissions will be "Rejected". If you need to resubmit your confirmation, please contact the TPA. They will void the "Accepted" confirmation in order to allow for additional transmissions. [Click here](#) for TPA Contact Information.

Invoice List

Displaying 1-10 of 218. [First/Prev] [1](#), [2](#), [3](#), [4](#), [5](#) [Next/Last]

Quarter	P Number	File Name	Inv Date	Confirm Status	Access File
2013-04	PTST1	R1522209.RPT.MANUF_INVOICE	2014-01-31	RE-TRANSMITTED_DISC	Raw Data Payment List Confirm Payments Confirmation File Confirmation Resp.
2013-04	PTST6	R1522191.RPT.MANUF_INVOICE	2014-01-31	NEW	Raw Data Payment List Confirm Payments Confirmation File Confirmation Resp.
2013-04	PTEST	R1522140.RPT.MANUF_INVOICE	2014-01-31	NEW	Raw Data Payment List Confirm Payments Confirmation File Confirmation Resp.
2013-04	PTEST	R1522124.RPT.MANUF_INVOICE	2014-01-31	NEW	Raw Data Payment List Confirm Payments Confirmation File Confirmation Resp.
2013-03	P1023	R1627607.RPT.MANUF_INVOICE	2013-10-31	NEW	Raw Data Payment List Confirm Payments Confirmation File Confirmation Resp.
2012-04	PTEST	R1643516.RPT.MANUF_INVOICE	2014-01-31	CONFIRMED	Raw Data Payment List Confirm Payments Confirmation File Confirmation Resp.
2013-04	P1336	R1522376.RPT.MANUF_INVOICE	2014-01-31	TRANSMITTED	Raw Data Payment List Confirm Payments Confirmation File Confirmation Resp.
2013-04	P1333	R1522374.RPT.MANUF_INVOICE	2014-01-31	UPDATED	Raw Data Payment List Confirm Payments Confirmation File Confirmation Resp.
2013-04	P1332	R1522373.RPT.MANUF_INVOICE	2014-01-31	PARTIAL_RESET	Raw Data Payment List Confirm Payments Confirmation File Confirmation Resp.
2013-04	P1330	R1522371.RPT.MANUF_INVOICE	2014-01-31	NEW	Raw Data Payment List Confirm Payments Confirmation File Confirmation Resp.





EFT Reminder



**Art Spaziano, Manager
Palmetto GBA
Medicare Part D, CGDP TPA**

EFT Information for Manufacturers and Sponsors

- It's the only way you can receive what you're owed
- No Dependency on APPS system
- Opportunity to update each quarter
 - No update needed if there are no changes
 - Reminders will be sent prior to each update deadline
- Full set of EFT records redistributed each quarter
 - Important for Manufacturers & Sponsors to download their respective files each quarter
 - Granular description of changes issued with each update
- ***EFT info for some DMs still missing!***



Contact Information



Art Spaziano, Manager
Palmetto GBA
Medicare Part D, CGDP TPA

Contacting the TPA

- **TPA website - <http://tpadministrator.com>**
- Phone
 - Help Line: 1-877-534-2772 – Option 1
 - Hours: Monday thru Friday 8am to 7pm 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

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](mailto:CMS_IT_service_desk@cms.hhs.gov) - Password Resets
 - [CMSHPMS access@cms.hhs.gov](mailto: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