

Manufacturers Webinar

May 4, 2011

Announcements

- Quarter I Invoice Reports Distributed
 - Distributed on Friday April 29th
 - Official Distribution Date April 30th
 - Manufacturers pay Part D Sponsors by June 7th 2011
 - Manufacturers confirm payment by June 12th, 2011
- Revised EFT file distribution
- Collect payer name from Manufacturers for distribution to Part D Sponsors.
- 1099 reporting status

Webinar Schedule

- June 1st, 2011 4:00-5:00 p.m. ET
- July 6th, 2011 4:00-5:00 p.m. ET

Agenda

- Appeals Guidance Follow up
- Medicare Part B versus D
- Low Volume Example
- Dispute Follow up
 - Early Fill Clarification
 - Dispute Process Overview
 - Dispute Edits

Appeals Guidance Follow up

Medicare Part B versus Part D

- The same drugs could be covered under Part B or Part D depending on patient/setting specifics
- Part D does NOT cover drugs that are covered under Medicare Parts B as prescribed and dispensed or administered with respect to that individual

Medicare Part B Coverage Categories

- Durable Medical Equipment (DME) Supply Drugs (Inhalation soln; IV “pump” drugs; must reside in home)
- Immunosuppressants (Medicare-covered transplant drugs)
- Oral Antineoplastics (7 drugs)
- Oral Antiemetics (full replacement only)
- IVIG (Primary Immune Deficiency)
- “Not usually self administered” drugs furnished incident to physician’s service

Low Volume Background Slide

- Currently no low volume invoices that have been distributed.
- CMS has not decided when low volume will be invoiced.
- The definition of low volume is 10 or fewer beneficiaries with the same NDC 9 drug dispensed by the same pharmacy.

Low Volume

Information:

Quarter 2

- 10 PDEs have been identified as part of a privacy related low volume group.
 - All 10 have a gap discount amount of \$1
- These 10 PDEs will be billed in summary as a low volume summary record DETLV.

Low Volume Example Continued

Header Record Manufacturer								
Header Record Labeler Code 54321								
Record Type	LV Ref#	Current Qtr	Prev Qtr	Labeler Code	Reported Gap Discount Previous Amount	Reported Gap Discount Current Amount	Gap Discount Amount This Period	PDE Count
DETLV	5432102011000000 0000	201102	000000	54321	0	10	10	10
Trailer Record Labeler Code 54321								
Trailer Record Manufacturer								

Low Volume Continued

(Example 2 continued)

Information:

Quater3

- Enough PDEs have been submitted to satisfy the privacy related requirements of 10 beneficiaries in the low volume summary.
- In addition a new PDE for a new beneficiary in the for the NDC 9/Pharmacy group came in this quarter with a gap discount amount of \$1
- 10 PDEs for 10 different beneficiaries, each with a gap discount amount of \$1, will now be billed individually. Previously they were invoiced in the low volume summary.
- An adjusted low volume summary will reflect the PDEs have been removed from it. The net amount of the -\$10 low volume summary and the 10 \$1 PDE's will net to zero.
- Note: The DETLV and DETCG reference numbers are different. PDEs that move from the DETLV record to individual DETCG records summary have a Y in Prior Low Volume Discount Flag.

Low Volume Continued

Header Record Manufacturer								
Header Record Labeler Code 54321								
Record Type	LV Ref#	Current Qtr	Prev Qtr	Labeler Code	Reported Gap Discount Previous Amount	Reported Gap Discount Current Amount	Gap Discount Amount This Period	PDE Count
DETLV	5432102011000000 0000	201102	000000	54321	0	10	10	10
Trailer Record Labeler Code 54321								
Trailer Record Manufacturer								

Header Record Manufacturer								
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Record Type	LV Ref#	Current Qtr	Prev Qtr	Labeler Code	Reported Gap Discount Previous Amount	Reported Gap Discount Current Amount	Gap Discount Amount This Period	PDE Count
DET LV	54321020110000000000	201103	201102	54321	10	0	-10	0
Trailer Record Labeler Code 54321								
Trailer Record Manufacturer								

Low Volume Continued

Header Record Manufacturer									
Header Record Labeler Code 54321									
Record Type	Ref#	Current Qtr	Prev Qtr	Labeler Code		Reported Gap Discount Previous Amount	Reported Gap Discount Current Amount	Gap Discount Amount This Period	Prior Low Volume Discount Flag
DETCG	5432100000000000175	201103	201102	5432144422	Other Fields Ex: fill #, etc	0	1	1	Y
DETCG	5432100000000000176	201103	201102	5432144422	Other Fields Ex: fill #, etc	0	1	1	Y
DETCG	5432100000000000177	201103	201102	5432144422	Other Fields Ex: fill #, etc	0	1	1	Y
DETCG	5432100000000000178	201103	201102	5432144422	Other Fields Ex: fill #, etc	0	1	1	Y
DETCG	5432100000000000179	201103	201102	5432144422	Other Fields Ex: fill #, etc	0	1	1	Y
DETCG	5432100000000000180	201103	201102	5432144405	Other Fields Ex: fill #, etc	0	1	1	Y
DETCG	5432100000000000181	201103	201102	5432144405	Other Fields Ex: fill #, etc	0	1	1	Y
DETCG	5432100000000000182	201103	201102	5432144405	Other Fields Ex: fill #, etc	0	1	1	Y
DETCG	5432100000000000183	201103	201102	5432144405	Other Fields Ex: fill #, etc	0	1	1	Y
DETCG	5432100000000000184	201103	201102	5432144405	Other Fields Ex: fill #, etc	0	1	1	Y
DETCG	5432100000000000185	201103	201102	5432144405	Other Fields Ex: fill #, etc	0	1	1	N
Trailer Record Labeler Code 54321									
Trailer Record Manufacturer									

Dispute Follow Up

Dispute Reason Codes

DISPUTE REASON CODE	DISPUTE REASON DESCRIPTION	SUPPORTING DETAIL REFERENCE NUMBER	SUPPORTING DATE 1	SUPPORTING DATE 2	ADDITIONAL INFORMATION (OPTIONAL)
D01	Duplicate Invoice Item	Reference Number			Provide additional supporting evidence (optional)
D02	Closed Pharmacy		NCPDP closed date		Provide additional supporting evidence (optional)
D03	Not PART D Covered Drug				Explain statutory exclusion that applies to this drug (required)
D04	Excessive Quantity				Excessive quantity on individual invoice item. Provide proprietary benchmark used to identify excessive quantity (required)
D05	Invalid Days Supply				Provide additional supporting information (required)
D06	High Price of the Drug				Provide additional supporting information (required)
D07	Last Lot Expiration Date		NDC directory drop date	Last lot expiration date	Provide additional supporting information (optional)
D08	Early Fill	Reference Number for early fill disputed			Provide additional supporting information (required)
D09	Marketing Category is not NDA or BLA		FDA update date		Provide additional supporting information (optional)
D10	Date of Service prior to 01/01/2011				Provide additional supporting information (optional)
D11	PDE improperly invoiced beyond Manufacturer Agreement Invoice period				Provide additional supporting information (optional)
D12	Invalid Prescription Service Reference Number				Provide additional supporting information (optional)
D99	Other				Provide additional supporting information (required)

Dispute Follow Up

D08-Early Fill Clarification

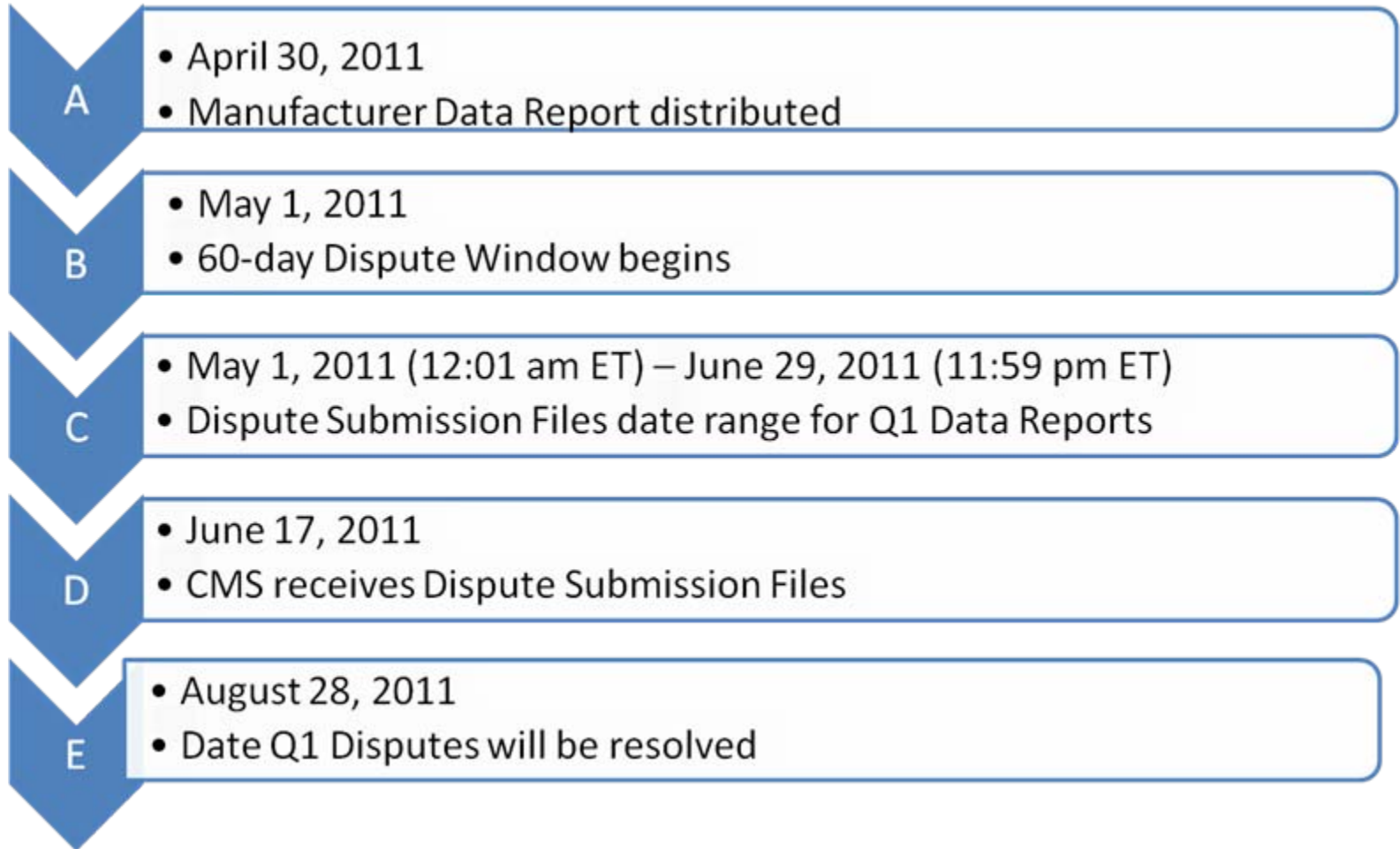
Fill number	RX Fill Date	Days Supply	Date fill should run out	Date fill actually runs out
1	2/1/2011	030	3/2/2011	3/2/2011
2	2/20/2011	030	3/21/2011	4/1/2011
3	4/2/2011	030	4/1/2011	5/1/2011

- This example illustrates that an Early Fill cannot be determined without appropriate prescription history.
- Initially, we expect fill 2 on March 2nd. Instead this fill occurs 10 days early on February 20th.
- However, fill 3 on 4/2 explains the refill pattern.
- A total of 90 days supply was dispensed in a 90 day interval.
- The average monthly supply is equal to 30 days.

DISPUTE PROCESS

- Quarter 1 Timeline
- Dispute Submission File Creation
- Dispute Return File Overview

Quarter 1 (Q1) TIMELINE



DISPUTE SUBMISSION FILE CREATION

- You will need:
 - Manufacturer Data Report
 - Distributed on April 30, 2011
 - File layout posted on CSSC web site
 - Dispute Submission File Layout
 - Posted on the CSSC web site

DISPUTE SUBMISSION FILE CREATION

- Manufacturer Data Report
 - Extract rows for dispute
- Detailed Dispute Information
 - Use Record Type Code DETCG
 - Add Dispute Reason Code as field 18
 - Add supporting dispute information in fields 19 – 22
 - Field 23 is reserved space
- Apply Headers and Trailers
 - Headers – use Record Type Code TPAMH
 - Trailers – use Record Type Code TPAMT

DISPUTE RETURN FILE OVERVIEW

- Detailed Dispute Return File
 - Record Type Code – Field 1
 - ACCCG – accepted for dispute consideration
 - REJCG – not accepted for dispute consideration
 - Fields 2 – 22 match Dispute Submission File
 - Disputes not accepted for dispute consideration
 - Field 23 identifies number of edit codes
 - Fields 24 – 33 identify specific edit codes
 - Definitions of edit codes are posted on the CSSC web site
 - Disputes accepted for dispute consideration
 - Record cannot be resubmitted
 - No changes can be made
 - Duplicate records within the same file, both will be rejected
 - Duplicate records are identified by Field 2 (Report ID) and Field 4 (Detail Reference Number)

Dispute File Layout

DISPUTE EDIT CODES	EDIT CATEGORY	Data Element to be Edited	Message to be Reported	Comments/Rationale	Failure Outcome (Reject)
EDITING MANUFACTURER DISPUTE FIELDS					
E101	M/I	REPORT ID / DETAIL REF NUMBER	Disputed detail reference number cannot be found on the manufacturer invoice specified.		Reject
E102	M/I	REPORT ID / DETAIL REF NUMBER	Detail reference number is not valid.		Reject
E103	M/I	TPA DISPUTE RECEIVED DATE / INVOICE DELIVERED DATE	Dispute received > 60 calendar days after invoice delivered date.	Disputes will not be accepted by CMS after 60 days. The count of the day starts when CMS delivered the invoices to manufacturers.	Reject
E104	M/I	PREVIOUS REPORT ID	Previous report identifier cannot be altered from original invoiced previous report identifier.		Reject
E105	M/I	PRODUCT SERVICE ID	Product service identifier cannot be altered from original invoiced product service identifier.		Reject
E106	M/I	PRESCRIPTION SERVICE REFERENCE NO	Prescription service reference number cannot be altered from original invoiced prescription service reference number.		Reject
E107	M/I	FILL NUMBER	Fill number cannot be altered from original invoiced fill number.		Reject
E108	M/I	DAYS SUPPLY	Days supply cannot be altered from original invoiced days supply.		Reject
E109	M/I	QUANTITY DISPENSED	Quantity dispensed cannot be altered from original invoiced quantity dispensed.		Reject
E110	M/I	DATE OF SERVICE (DOS)	Date of service cannot be altered from original invoiced date of service.		Reject
E111	M/I	SERVICE PROVIDER ID QUALIFIER	Service provider identifier qualifier cannot be altered from original invoiced Service provider identifier qualifier		Reject
E112	M/I	SERVICE PROVIDER ID	Service provider identifier cannot be altered from original invoiced Service provider identifier		Reject
E113	M/I	REPORTED GAP DISCOUNT PREVIOUS AMOUNT	Reported gap discount previous amount cannot be altered from original invoiced Reported gap discount previous amount		Reject
E114	M/I	REPORTED GAP DISCOUNT CURRENT AMOUNT	Reported gap discount current amount cannot be altered from original invoiced Reported gap discount current amount		Reject
E115	M/I	GAP DISCOUNT AMOUNT THIS PERIOD	Gap discount amount this period cannot be altered from original invoiced date of service		Reject
E116	M/I	PRIOR LOW VOLUME DISCOUNT FLAG	Prior low volume discount flag cannot be altered from original invoiced prior low volume discount flag		Reject
E117	M/I	DISPUTE REASON CODE	Invalid dispute reason code.		Reject
E118	M/I	P-NUMBER/SUPPORTING DETAIL REFERENCE NUMBER	Supporting detail reference number does not exist on any manufacturer Invoice .		Reject
E119	M/I	SUPPORTING DATE 1	Invalid calendar date		Reject
E120	M/I	SUPPORTING DATE 2	Invalid calendar date		Reject
E121	M/I	FILLER	Filler must be spaces.		Reject
E777	DUP	REPORT ID / DETAIL REF NUMBER	Duplicate dispute. Original dispute has already been accepted for dispute consideration.		Reject
E785	DUP	REPORT ID / DETAIL REF NUMBER	Duplicate dispute exists within the submitted file. All duplicated records within this file are rejected.	Reject both the disputes, if it is an duplicate.	Reject

Dispute File Layout

EDITING BASED ON DISPUTE REASON CODE				
E210	D01	DISPUTE REASON CODE / SUPPORTING DETAIL REFERENCE NUMBER	For dispute reason code D01 - Supporting Detail Reference Number is missing. The Detail Reference Number of the duplicate claim is required.	Reject
E220	D02	DISPUTE REASON CODE / SUPPORTING DATE 1	For dispute reason code D02 - Supporting Date 1 is missing. The NCPDP Pharmacy Closed Date should be reported in Supported Date 1.	Reject
E221	D02	DISPUTE REASON CODE / SUPPORTING DATE 1/DOS	For dispute reason code D02 - Supporting Date 1 (NCPDP pharmacy Closed Date) is after PDE DOS.	For Dispute reason code D02 (closed pharmacy) - Supporting date 1 (NCPDP pharmacy closed date) should be before PDE DOS. Reject
E230	D03	ADDITIONAL INFORMATION	For dispute reason code D03 - Additional Information field is blank. Additional Information is required.	Reject
E240	D04	ADDITIONAL INFORMATION	For dispute reason code D04 - Additional Information field is blank. Additional Information is required.	Reject
E250	D05	ADDITIONAL INFORMATION	For dispute reason code D05 - Additional Information field is blank. Additional Information is required.	Reject
E260	D06	ADDITIONAL INFORMATION	For dispute reason code D06 - Additional Information field is blank. Additional Information is required.	Reject
E270	D07	DISPUTE REASON CODE / SUPPORTING DATE 1	For dispute reason code D07 - Supporting Date 1 is missing. The NDC Directory Drop Date is required.	Reject
E271	D07	DISPUTE REASON CODE /SUPPORTING DATE 2	For dispute reason code D07 - Supporting Date 2 is missing. The Last Lot Expiration Date is required.	Reject
E272	D07	DISPUTE REASON CODE / SUPPORTING DATE 1 / DOS	For dispute reason code D07 - Supporting Date 1 (FDA NDC Directory Drop Date) is after the PDE Date of Service.	For Dispute reason code D07 (last lot expiration date) - Supporting date 1 (FDA NDC Directory drop date) should be before PDE DOS. Reject
E273	D07	DISPUTE REASON CODE / SUPPORTING DATE 2 / DOS	For dispute reason code D07 - Supporting Date 2 (Last Lot Expiration Date) is after the PDE Date of Service.	For Dispute reason code D07 (last lot expiration date) - Supporting Date 2 (Last Lot Expiration Date) should be before PDE DOS. Reject
E280	D08	DISPUTE REASON CODE / SUPPORTING DETAIL REFERENCE NUMBER	For dispute reason code D08 - Supporting Detail Reference Number is missing. The Detail Reference Number of the previous fill is required.	Reject
E281	D08	ADDITIONAL INFORMATION	For dispute reason code D08 - Additional Information field is blank. Additional Information is required.	Reject
E290	D09	DISPUTE REASON CODE / SUPPORTING DATE 1	For dispute reason code D09 - Supporting Date 1 is missing. The FDA NDC Directory Update Date is required to document the NDC is not an NDA or BLA.	Reject
E291	D09	DISPUTE REASON CODE / SUPPORTING DATE 1/DOS	For dispute reason code D09 - Supporting Date 1 (FDA NDC Directory update date) is after PDE DOS.	For Dispute reason code D09 (Marketing category is not NDA or BLA) - Supporting date 1 (FDA NDC Directory update date) should be before PDE DOS. Reject
E900	D99	ADDITIONAL INFORMATION	For dispute reason code D99 - Additional Information field is blank. Additional Information is required.	Reject