

Updates to the Manufacturer Invoice, Payment Confirmation, and Dispute File Layouts to Accommodate the Inclusion of Multiple Benefit Years on a Single Invoice

Beginning with the invoices distributed in April 2012, there will be data from multiple benefit years invoiced at each quarterly cycle. At this time, there will be PDE data invoiced from Q1 2012, as well as from Q5 2011.

Because Prescription Drug Event records (PDEs) can be submitted up to three years following the date of service, updates have been made to several file layouts in order to accommodate the inclusion of multiple benefit years on a single invoice.

The new layouts, which go into effect with the Q1 2012 invoice distributed in April, will allow manufacturers to make a single EFT payment to each Part D contract that is the sum of the invoice amounts across multiple benefit years. The following file layouts are impacted:

Attachment 1: Manufacturer Invoice Report

Attachment 2: Manufacturer Data Report

Attachment 3: Manufacturer Payment Confirmation Report

Attachment 4: Manufacturer Payment Confirmation Report Response File

Attachment 5: Manufacturer Dispute Submission File

Attachment 6: Manufacturer Dispute Return File

This document summarizes the changes to each file in greater detail. Any questions regarding these changes should be directed to the TPA.

Changes to the Manufacturer Invoice Report:

The file structure of the Manufacturer Invoice Report adds additional record types called the BYRH and the BYRT. The purpose of this header and trailer pair is to contain and summarize multiple LBLR records belonging to a single manufacturer that will now be benefit year specific. The BYRT records will then be summarized further by contract in the TPACT record. The TPACT record remains the basis for manufacturers to confirm payment to each Part D sponsor.

The following existing record types (TPAMH, TPACH, TPACT, and TPAMT) and the newly added BYRH and BYRT have a field called Current Reporting Period. The Current Reporting Period will be populated with the calendar year and quarter for which the invoice was created. Because this is based on the calendar year, the reported quarter will not exceed Q4. This is in contrast to the Report ID field on the LBLR record which is benefit year specific and therefore the reported quarter could be up to Q17 to accommodate the three year PDE submission acceptance window following the end of a benefit year.

To the LBLR record, the fields Total Reported Gap Discount Previous Amount and Total Reported Gap Discount Current Amount have been added in order to substantiate the amount reported in the Total Gap Discount Amount this Period field. Further definition of these fields is provided in the following section of this memo. Please note that the addition of these two fields does shift the position in the record that the Total Gap Discount Amount this Period will appear.

The TPACT record reflects one noteworthy change. The field previously called Detail Record Count has been replaced with a field called Benefit Year Record Count. The Benefit Year Record Count displays the number of years reported for this Part D contract, or the count of BYRT records for the contract.

The TPACT record on the Manufacturer Invoice Report informs manufacturers of the total due to each Part D sponsor across all benefit years for the current reporting period and is the basis for invoice payment confirmation. The TPAMT record remains the basis for the trailer record on the Manufacturer Payment Confirmation Report.

Changes to the Manufacturer Data Report:

On the Contract Data Report, the TPALH and TPALT records are benefit year specific and the Current Reporting Period field has been added. This change shifts the Report ID field to a later position in the record and also shifts the position of all subsequent fields as well. Additionally on the TPAMH/TPAMT, the Current Reporting Period has replaced the Report ID.

Due to the change in policy regarding invoicing low volume claims (see HPMS memo dated January 27, 2012 titled “Medicare Coverage Gap Discount Program—Update on Low-Volume Claims”), the DETLV record has been removed from the Manufacturer Data Report along with the Prior Low Volume Discount Flag field on the DETCG record.

While the fields Reported Gap Discount Previous Amount, Reported Gap Discount Current Amount and Gap Discount Amount This Period remain on the DETCG record, due to the number of questions received, further explanation of these fields is warranted. When an invoiced PDE represents an adjustment of a PDE that was previously invoiced, the most recent previously invoiced amount that appeared in the “Reported Gap Discount Current Amount” on the previous invoice will be displayed in the field called Reported Gap Discount Previous Amount on the current invoice. The Reported Gap Discount Current Amount field represents the dollars from the Reported Gap Discount Amount on the most recently received version of the PDE as of the current invoice period. The total amount due for this invoice is calculated as Reported Gap Discount Current Amount minus Reported Gap Discount Previous Amount and is reported in the field titled Gap Discount Amount this Period.

The Previous Reporting Period and Current Reporting Period fields have also been added to the DETCG record to allow manufacturers to track the specific invoice quarter (Q1 – Q4 of a calendar year) in which a PDE that was adjusted in the current invoice quarter was previously reported.

The Detail Record Count on the TPAMT trailer record has been expanded by one position to an eight byte field. This shifts all fields following the Detail Record Count over by one position in the record and decreases the Filler space by one position.

Changes to the Manufacturer Payment Confirmation Report:

While a new level of summarization was added to the Manufacturer Invoice Report file layout to add invoiced amounts from multiple benefit years across a single labeler, this change does not impact the record type that serves as the basis for the Manufacturer Payment Confirmation Report. Manufacturers will continue to use the TPACT record as the basis for confirming the amount paid to each Part D sponsor and the TPAMT record as the basis for confirming the grand total paid to all Part D sponsors. LBLR records from the Manufacturer Invoice Report will no longer be reported back on the Manufacturer Payment Confirmation Report as no additional data was added to these records by manufacturer to generate the confirmation.

On the Manufacturer Payment Confirmation Report, the TPA will begin collecting payment method information from all manufacturers. The Payment Method field has been added to the TPACT record and is defined as ACH, Wire, or Other. Because this field is added only to the TPACT record, manufacturers can designate different payment methods for each Part D contract being paid.

Changes to the Manufacturer Payment Confirmation Report Response File:

Only two changes were made to the Manufacturer Payment Confirmation Report Response File in order to maintain consistency with changes to other file layouts. The first change occurs on the fifth line, field #2 which now reports the Current Reporting Period from the TPAMH record. The second change occurs on the seventh line, field #5 which now eliminates reference to the LBLR record type since that record is no longer returned on the Manufacturer Payment Confirmation Report.

Changes to the Manufacturer Dispute Submission File:

Manufacturers use the Data Report to create the files used to submit disputes, so the updates to the Data Report carryover to the Dispute Submission File. Further, because the Dispute Return file contains the entire Dispute Submission File transaction submitted by the manufacturer, the changes that are highlighted below also apply to the Dispute Return file. The updates to the Dispute Submission File allow manufacturers to submit disputes for multiple benefit years in one file, beginning with the Quarter 1 2012 dispute submission period.

On the header and trailer records of the Dispute Submission and Dispute Submission Return files, the TPAMH and TPAMT records, Current Reporting Period replaces the Report ID field. As mentioned in a previous section of this memo, the Current Reporting Period is calendar year specific and references the year and quarter when the invoice was issued. For this reason, the value for the quarter (QQ) should never surpass "04." This is the only update to the TPAMH record in the Dispute Submission and Dispute Return files.

The DETCG record on the Dispute Submission File and the ACCCG_REJCG record on the Dispute Submission Return File also reflect the updates to the Manufacturer Data Report. In line with those updates, the Prior Low Volume Discount Flag has been removed from the DETCG and ACCCG_REJCG records on the Dispute Submission and Dispute Return files, in accordance with the change to the low volume policy. Also in line with updates to the Data Report, the DETCG and ACCCG_REJCG records include two new fields, Previous Reporting Period and Current Reporting Period.

It is important to note that the addition of these two new fields shifts all of the fields that follow Current Reporting Period over by 11 positions, and that on the Dispute Submission File, the affected fields are the fields that manufacturers are expected to populate. Affected fields on the Dispute Submission File include: the Dispute Reason Code, Supporting Detail Reference Number, Supporting Date 1, Supporting Date 2, and Additional Information. Manufacturers should note that this update also shifts the position of the fields used for error reporting on the Dispute Submission Return File.

Because the DETCG and ACCCG_REJCG records are at the PDE detail level, these records remain benefit year and quarter specific. No changes to the Report ID field were made on these records, and manufacturers should continue to use the Report ID to indicate the specific benefit year and quarter when submitting disputes.

Lastly, the clarifications to the fields Reported Gap Discount Previous Amount and Reported Gap Discount Current Amount discussed in the section on the Manufacturer Data Report also apply to the DETCG and ACCCG_REJCG records in the Dispute Submission and Dispute Return files.

On the TPAMT record, the Current Reporting Period field replaces Report ID. In addition, the Total Detail Record Count field has been expanded by one position to an eight byte field. These changes affect the TPAMT in both the Dispute Submission and Dispute Submission Return file.

Additions to the Manufacturer Dispute Reason Codes:

There are two new valid values for the Dispute Reason Code field on the Dispute Submission file. Due to manufacturer feedback, there are now separate reason codes for manufacturers to use if they wish to file disputes on the basis that the reported gap discount amount exceeds the maximum for a single PDE or for all PDEs submitted for a single beneficiary. The two new Dispute Reason Code values are:

D13 – Gap discount for disputed PDE exceeds maximum discount amount for a single PDE

D14 – Total accumulated gap discounts reported across multiple PDEs for a single beneficiary exceed cumulative maximum discount amount

Manufacturers should refer to HPMS guidance released on January 27, 2012 titled “Medicare Coverage Gap Discount Program – Maximum Applicable Discounts” and on March 2012 titled “Medicare Coverage Gap Discount Program – Dispute Resolution” for further discussion on the maximum applicable discount issue. An updated Dispute Reason Code document can be found on the CSSC Operations website.

Changes to the Manufacturer Dispute Return File:

The file layout changes to the Manufacturer Dispute Return file are discussed in the previous section on the Manufacturer Dispute Submission file. In addition to file layout changes, however, there are also two new edit codes to edit and validate the Current Reporting Period and the Previous Reporting Period fields. The two new edits are:

- E122 - Previous Reporting Period cannot be altered from original invoiced Previous Reporting Period.
- E123: Current Reporting Period cannot be altered from original invoiced Current Reporting Period.

There are also two new edit codes to validate the Additional Information field when manufacturers submit disputes for the two new Dispute Reason Codes of D13 and D14. Those two new edits are:

- E330: For dispute reason code D13 – Additional Information field is blank. Additional Information is required.

- E340: For dispute reason code D14 – Additional Information field is blank. Additional Information is required.
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An updated CG Manufacturer Dispute Edits document can be found on the CSSC Operations website.

Changes to the Manufacturer Dispute Resolution File:

The Manufacturer Dispute Resolution File will also require changes but this will be done in a future release.