

**SPONSOR  
ONBOARDING  
TRAINING**

**PALMETTO GBA**  
A CELERIAN GROUP COMPANY

Coverage Gap  
Discount Program  
(CGDP)

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## **CGDP Onboarding Training**

Onboarding is the training process that describes requirements all Part D Plan Sponsors are encouraged to complete to participate and fulfill program requirements of the Coverage Gap Discount Program (CGDP).

In this training you will learn about –

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

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

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

Section 1860D-14(A) (d) requires that the Centers for Medicare and Medicaid Services (CMS) contract with a Third Party Administrator (TPA) to:

- Receive and transmit information between CMS, pharmaceutical Manufacturers, Part D Sponsors, 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 and Part D Sponsors

The TPA is the single point of contact between the pharmaceutical Manufacturers (including their third party vendors) and the Part D Sponsors participating in the Program.

## CGDP (Program) Overview Coverage Gap Discount Flow

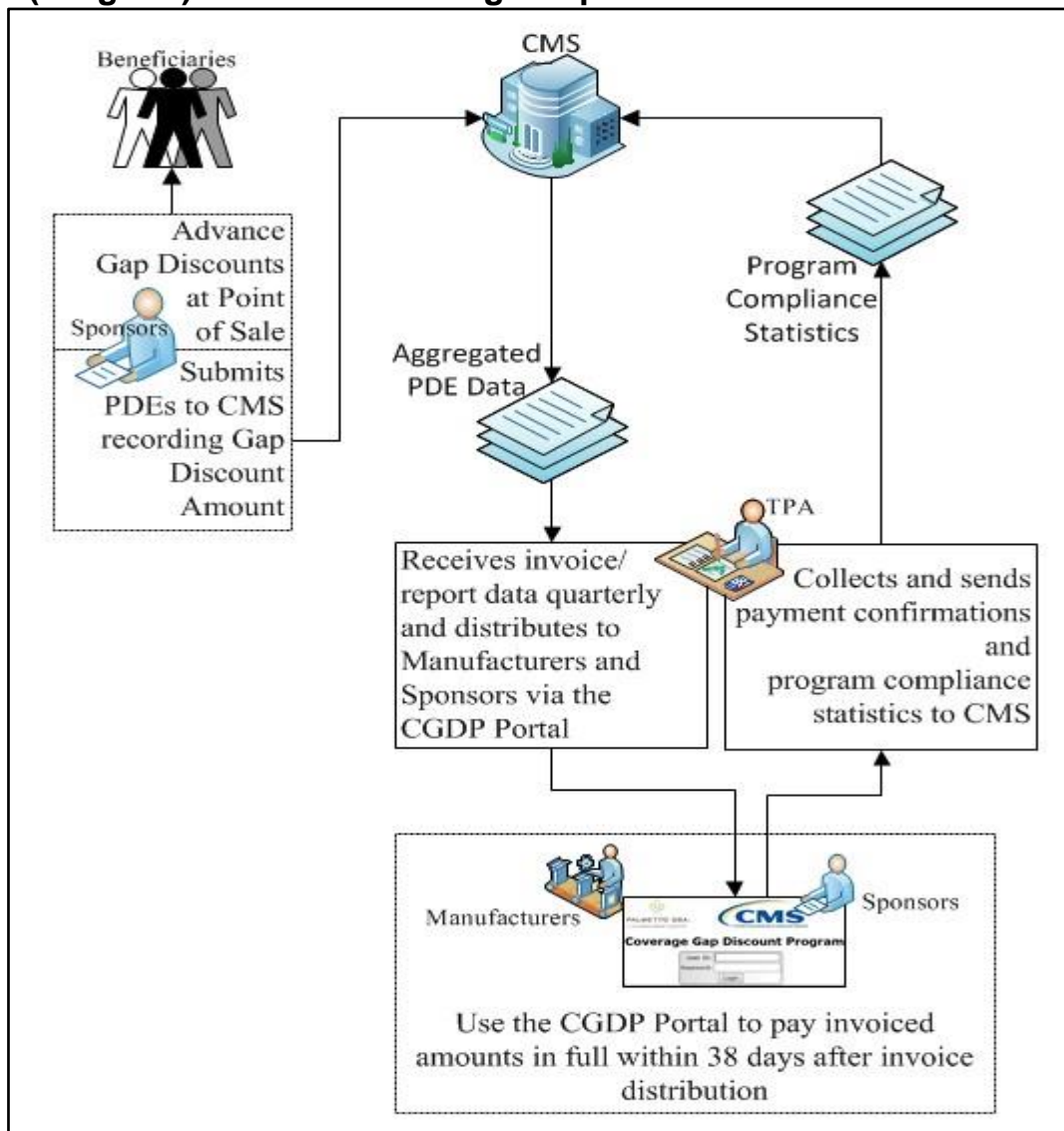


Figure 1: Coverage Gap Discount Program Overview Diagram

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

## CGDP (Program) Overview Invoice Distribution Schedule

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

The table displayed here provides the reporting period quarter end and report distribution dates.

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

Figure 2: Reporting Period Quarter End and Distribution Dates

A full program calendar can be found at the TPA website <https://www.tpadministrator.com>.

The **CGDP Calendar** link appears under the Topics menu. Users can select the **Medicare Part D Coverage Gap Discount Program Calendar** link to view the full calendar.

The screenshot shows the TPA Administrator website interface. The browser address bar displays <https://www.tpadministrator.com/internet/tpaw3.nsf/DID/R1U3Q5D1T5>. The website header includes the Palmetto GBA logo and navigation links for Home, Archives, Contact Us, and Email Updates. A search bar is located in the top right. The main navigation menu shows 'TPA', 'Topics' (highlighted with a red box), and 'Tools'. The breadcrumb trail reads 'Topics / CGDP Calendars / Medicare Part D Coverage Gap Discount Program (CGDP) Calendar'. The left sidebar lists 'CGDP Calendars' with sub-items: 'Labeler Code Update Calendar' and 'Medicare Part D Coverage Gap Discount Program (CGDP) Calendar'. The main content area features the title 'Medicare Part D Coverage Gap Discount Program (CGDP) Calendar' and a descriptive paragraph. A link to the 'Medicare Part D CGDP Calendar (Version 05.10.2018, PDF, 690.65Kb)' is highlighted with a red box. The page footer indicates 'Last Updated: 07/02/2019'.

Figure 3: CGDP Calendar on TPAdministrator.com Website

## **Onboarding Forms**

### **Sponsor Onboarding Form Requirements**

Sponsors (and their third party vendors) that participate in the Program 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.

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

- CMS HPMS Access via Enterprise User Authentication (EUA) Instruction
- Electronic Funds Transfer (EFT) Online Form Automated Clearinghouse (ACH Deposit)
- Electronic Funds Transfer (EFT) Online Form (ACH Payment)
- CGDP Reconciliation (Payment Reconciliation Summary (PRS) form
- Third Party Registration Form (if applicable)
- ListServ registration



## Sponsor Welcome Letter

The Welcome Letter provides new Sponsors with instructions for obtaining access to the 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**

**Sponsor Welcome Letter**

The Third Party Administrator (TPA) Support Center for Part D Sponsors welcomes you to the Coverage Gap Discount Program (CGDP). We provide online access to retrieve information and reports for the CGDP, such as the Contract Data Reports, Contract Summary Reports, Coverage Gap Tracking Reports, and Manufacturer 1099 Information. According to the data provided in the CMS Health Plan Management System (HPMS), the contract number(s) listed below will be effective 1/1/20YY.

<u>Contract Number(s)</u>	<u>Parent Org. ID</u>	<u>Contract Name</u>
H0000	H0000	CGDP Portal Insurance

Figure 4: Sponsor Welcome Letter – Excerpt of Page One (1)

Page three of the Welcome Letter requires the completion of Table 1 if the Sponsor has opted to use a third party vendor. This table is completed if a third party vendor is authorized to receive Invoice, Data, and Tracking reports for the Manufacturer.

**Table 1: Third Party Vendor Reports**

Distribute all report(s) to Third Party Vendor?	<input type="checkbox"/> Yes <input type="checkbox"/> No (If no specify which reports they should receive.) <input type="checkbox"/> Invoice <input type="checkbox"/> Data <input type="checkbox"/> Tracking Reports
Third Party Vendor Name:	
Email Address:	
Phone Number:	

Figure 5: Sponsor Welcome Letter – Table 1 Page Three (3) Third Party Vendor Reports

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

The last page of the Welcome Letter provides Manufacturers with a checklist of documents and links referenced in the Welcome Letter. This checklist is provided for Sponsors to track the documents needed in the onboard process and provides a description of each one.

<b>Table 2: Documents Checklist</b>	
<i>Checklist of Documents/Links referenced in the Welcome Letter</i>	
<b>DOCUMENT</b>	<b>FORM DESCRIPTION</b>
HPMS Point of Contact Information <a href="#">HPMS</a>	Website <b>(Ensure this is the most current information)</b>
Electronic Funds Transfer (EFT) Online Form <a href="#">Deposit Information Form</a>	Receive deposits from entities <b>(Form submitted electronically)</b>
EFT Online Form <a href="#">Payment Information Form</a>	Make payments to entities <b>(Form submitted electronically)</b>
Listserv Registration <a href="#">Email Updates</a>	Ability to receive email announcements from TPA Operations
Third Party Registration Form (If applicable)	Complete if Third Party is managing payments or retrieving reports <b>(Form to be emailed to TPA Operations)</b>

Figure 6: Sponsor Welcome Letter – Table 2: Documents Checklist on Page Four (4)

## **Sponsor HMPS Access**

### **Sponsor CMS HPMS Access**

HPMS is the system of record for all Sponsor contacts. Sponsors are responsible for keeping their information updated, always.

To obtain access to the CGDP Portal, the Sponsor must enter contact information in HPMS for the TPA Liaison and the Coverage Gap Discount Program (CGDP) Payment Contact, which allows an authorized user to review and process quarterly invoices for the CGDP.

In addition, CMS uses the Sponsor contacts within HPMS to communicate key matters of policy and compliance. Therefore, Sponsors should ensure that individuals within their organizations have ongoing access to HPMS.

## CMS HPMS Access – EUA Form

Sponsor associates listed in the Welcome Letter as the TPA Liaison or Coverage Gap Discount Program (CGDP) Payment Contact must have access to HPMS to be granted access to the CGDP Portal.

To obtain HPMS access, the EUA Workflow Request online form must be completed.

**Instructions for Requesting a New CMS User ID:  
HPMS Plan Users**

**Prior to starting this process, please add the following email addresses to your email address book and/or “safe senders list” to ensure delivery: [EUA@cms.hhs.gov](mailto:EUA@cms.hhs.gov) and [ESS@cms.hhs.gov](mailto:ESS@cms.hhs.gov)**

1. Open your web browser and enter the EUA Front-End Interface (EFI) URL:  
<https://eua.cms.gov/efi>

**Note:** At this time, you must use either IE 9+ or Firefox 35+ with compatibility mode disabled. Google Chrome is not currently supported.

2. Click the “Register” button.
3. Enter your personal details in the respective boxes. Create your own “username” and “password”.

**Note:** Both the user name and password are case sensitive. The password must be eight to twenty-four characters long, include at least one uppercase letter, contain at least one special character (e.g., @, !, %), and contain at least one number. The email address you use in EFI must be the same email address you will use in HPMS user account.

*Figure 7: Example of Instructions for Requesting New CMS User ID for HPMS*

To access the online form, go to the [CMS.gov User ID Process](#) page and select the “Instructions for Requesting Plan Access via EFI (PDF)” link to review the instructions for requesting a New User ID.

## Sponsor CGDP Portal Login Credentials

To set up connectivity, CMS requires that there be a TPA Liaison Contact listed in HPMS. A Coverage Gap Discount Program (CGDP) Payment Contact can also be listed in HPMS.

Once this contact information appears in HPMS, login credentials will be provided to the Sponsor TPA Liaison and/or Coverage Gap Discount Program (CGDP) Payment Contact, if applicable to access the CGDP Portal, which is used to facilitate the CGDP quarterly invoicing and direct payment processing.

### **Note:**

Login credentials will **only** be provided to the TPA Liaison or Coverage Gap Discount Program (CGDP) Payment contact. The TPA Liaison Contact will be assigned view and payment privileges in the Portal, unless there is a Coverage Gap Discount Program (CGDP) Payment Contact listed in HPMS.

If a Coverage Gap Discount Program (CGDP) Payment Contact is listed, they will be assigned view and payment capabilities in the CGDP Portal whereas the TPA Liaison will now be granted view-only capabilities.

In addition, CMS will not excuse or extend deadlines for failure to have the correct TPA Liaison or Coverage Gap Discount Program (CGDP) Payment contact information listed on the HPMS website.

## Sponsor CGDP Portal User ID and Password Emails

Once the TPA Liaison or Coverage Gap Discount Program (CGDP) Payment Contact is listed in HPMS, the authorized Sponsor associate will be required to contact TPA Support Center to receive an initial temporary password. The User ID is included in the Welcome Letter and can be communicated to the applicable user via email during the initial onboarding logon process.

For information on accessing the CGDP Portal, refer to [The CGDP Portal](#) section of this document.

## Banking Information ACH Deposit Form

Sponsors are required to complete an ACH Deposit Form to provide a depository account to receive Manufacturer CGDP adjustment funds initiated via the CGDP Portal.

**Note:** Only the TPA Liaison or Coverage Gap Discount Program (CGDP) Payment Contact is authorized to complete bank account updates for your company.

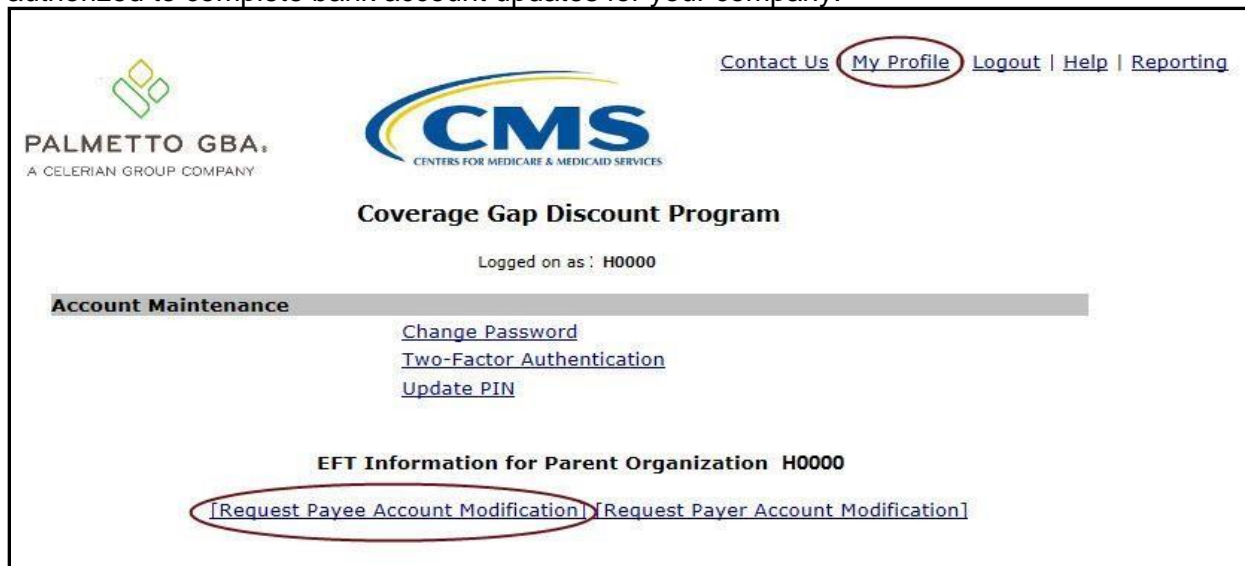


Figure 8: Request Payee Account Modification link in the CGDP Portal

The form is in the CGDP Portal and can be accessed after successful login to the portal:

- Click on “My Profile” in the upper right hand corner of the CGDP Portal.
- Under the Account Maintenance section, select “Request Payee Account Modification” to provide information for the bank account to receive CGDP payments.

## ACH Payment Form

Sponsors are required to complete an ACH Payment Form to provide a debit account to remit Manufacturer CGDP payments initiated via the CGDP Portal.

**Note:** Only the TPA Liaison or Coverage Gap Discount Program (CGDP) Payment Contact is authorized to complete bank account updates for your company.

**Coverage Gap Discount Program**

7/2/2021 5:19 PM Logged on as H0000  
Test Environment

**Account Maintenance**

[Change Password](#)  
[Update PIN](#)

**Organization Information**

[My Organization](#)

**EFT Information for Parent Organization H0000**

[\[Request Payee Account Modification\]](#) [\[Request Payer Account Modification\]](#)

Figure 9: Request Payer Account Modification link in the CGDP Portal

The form is in the CGDP Portal and can be accessed after successful login to the portal:

- Click on “My Profile” in the upper right hand corner of the CGP Portal.
- Under the Account Maintenance section, select “Request Payer Account Modification” to provide information for the bank account to receive CGDP payments.

## CGDP Reconciliation (PRS) Form

Sponsors are also required to complete a Payment Reconciliation Summary (PRS) report form. PRS reports are generated and distributed on an annual basis. The CGDP Reconciliation reconciles the prospective CGDP payments with the actual reported gap discount amounts invoiced during the first six quarters of the benefit year.

The form is located on the TPA website, <https://www.tpadministrator.com>.

Figure 10: PRS Form Link

- Select the **CGDP Reconciliation** link located under the Topics menu
- Select the **PRS Form** subtopic link and click on the [Payment Reconciliation System \(PRS\) Form](#) link (outlined in red) in the text on the PRS Form page


A designated Sponsor representative is required to complete the required data listed on the CGDP Reconciliation Summary Report form. 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 *Authorized Signer Information* sections of the PRS form.




An example of the complete PRS form is provided here:

Third Party Administrator (TPA) Support Center



**PALMETTO GBA**  
A CELEBRIAN GROUP COMPANY



**CMS**  
CENTERS FOR MEDICARE & MEDICAID SERVICES

**Coverage Gap Discount Program (CGDP)  
Reconciliation Summary Reports**

**Contact Information**

Name of Company: *CDGP Portal Insurance*  
 Address: *1234 CGDP Way Suite TPA1*  
 City, State Zip: *Anytown, MD 12345*  
 Contact Person: *Audi T. Ready*  
 Email Address: *.audi.t.ready@cgdpportalins.com*  
 Phone Number: *(401) 555-6879*

**Please provide the contract number(s) in which the person above is authorized to receive the CGDP Reconciliation Summary Report for:**

*H\_\_\_ H\_\_\_ H\_\_\_*

This document contains information of a proprietary nature. Information contained herein shall be kept confidential and divulged only to persons who, by nature of their duties, require access to such documentation.

**Authorized Signer Information**

*I am authorized to sign this document on behalf of the indicated party and I have read and agree to the foregoing provisions and acknowledge the same by signing below.*

<p>Audi T. Ready  <b>Name</b>  <u><i>Audi T. Ready</i></u>  <small>Audi T. Ready (Jan 11, 2018)</small>  <b>Signature</b></p>	<p>audi.t.ready@cgdpportalins.com 401-555-6879  <b>Email Phone Number</b>          Jan 11, 2018  <b>Date</b></p>
-----------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------

*TPA Operations/Leticia Reid*  
TPA Operations/Leticia Reid (Jan 12, 2018)  
**TPA Representative Signature**

Figure 11: PRS Form Example

### Sponsor Third Party

#### Third Party Vendor Onboarding Form Requirements

If a Third Party vendor is designated by a Sponsor in the Sponsor Welcome Letter, the TPA Support Center will send a two page Welcome Letter to the Third Party vendor using the email supplied in the Sponsor Welcome Letter Table 1: Third Party Vendor Reports.

**Third Party Vendors:** Sponsors may elect a third party vendor to receive a copy of the Invoice, Data, and Tracking reports. To designate a third party vendor, please complete the information in Table 1: Third Party Vendor Reports below and submit to [tpaoperations@tpadministrator.com](mailto:tpaoperations@tpadministrator.com). We will immediately initiate procedures to establish connectivity with the third party vendor. We will provide additional information to third party vendors to authorize report disclosures in a separate correspondence.

**Table 1: Third Party Vendor Reports**

Distribute all report(s) to Third Party Vendor?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If no specify which reports they should receive.) <input checked="" type="checkbox"/> Invoice <input checked="" type="checkbox"/> Data <input type="checkbox"/> Tracking Reports
Third Party Vendor Name:	Third Party Vendor Systems, LLC
Email Address:	<a href="mailto:Joe.Smith@TPVSystemsLLC.com">Joe.Smith@TPVSystemsLLC.com</a>
Phone Number:	123-555-1234

Figure 12: Example of Completed Third Party Vendor Reports Table

The Third Party Vendor Welcome Letter contains instructions for completing and returning CGDP information to the TPA Support Center via email.

## Sponsor Third Party Vendor Welcome Letter

The first page of the Third Party Vendor Welcome Letter provides a brief introduction to the Program for Third Party Vendors, how to return the completed form back to TPA Operations, and instructions for completing the second page of the Welcome Letter.

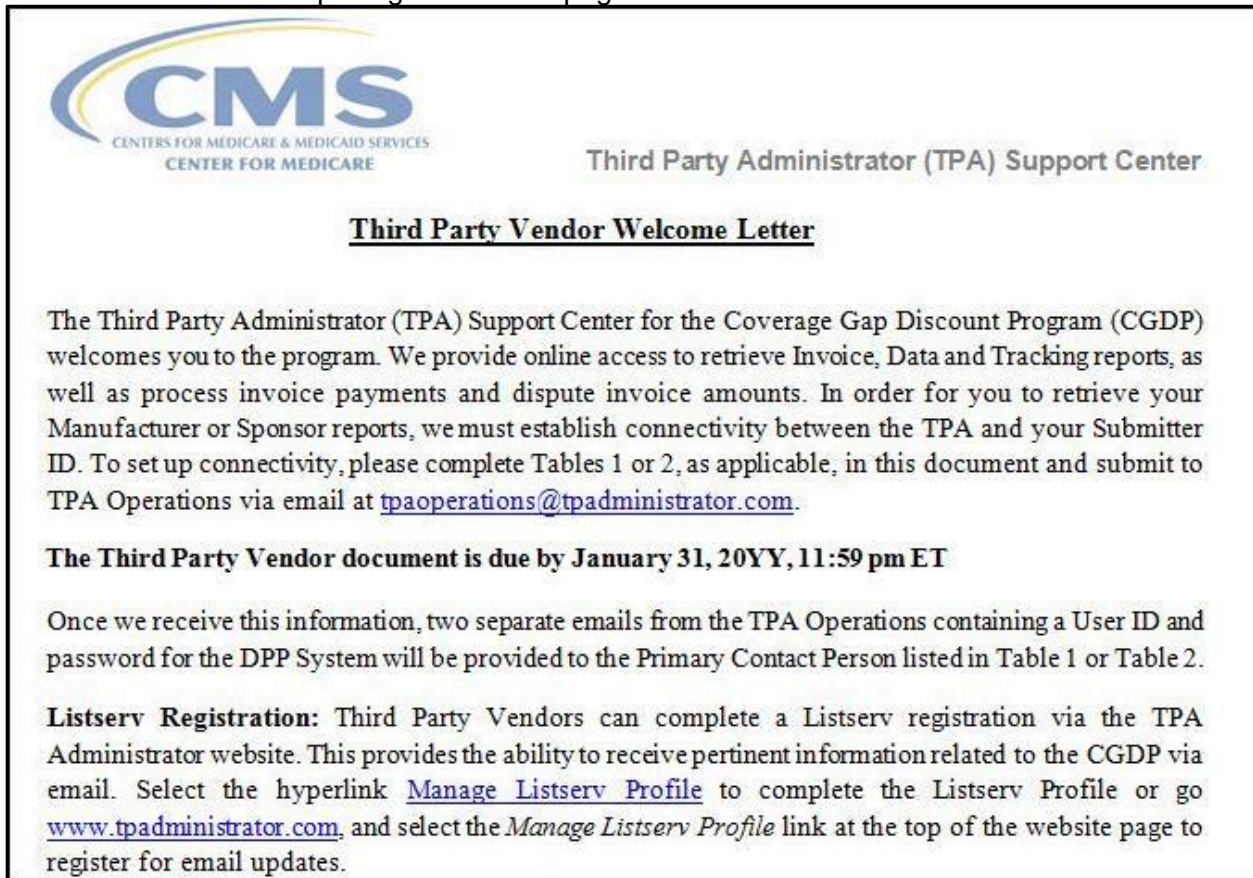


Figure 13: Example of Third Party Vendor Welcome Letter – Page One (1)

The second page of the Third Party Vendor Welcome Letter provides information about the Sponsor authorizing the third party vendor organization access to Program information.

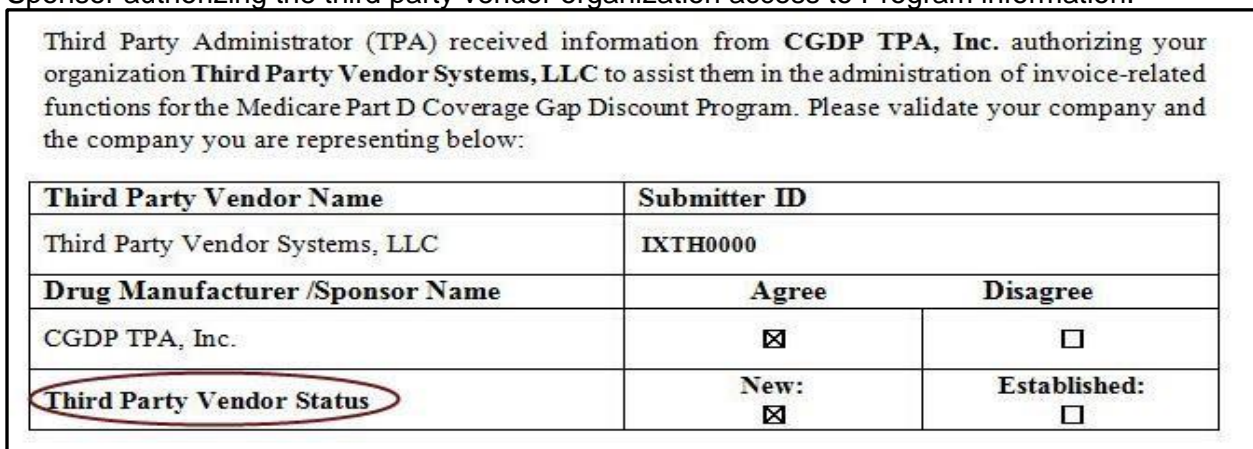


Figure 14: Example of Third Party Vendor Welcome Letter – Page Two (2)

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

- *Table 1: New Third Party Vendors*
- *Table 2: Established Third Party Vendors*

Two additional tables are located on the second page. One of these two 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 Support Center (as seen in Figure 18).

## The CGDP Portal

### CGDP Portal Access

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

The CGDP Portal will provide functionality for the following:

- Invoice review
- Invoice payment selection
- Invoice payment deferment\*
- Batch Invoice payment selection
- Automatic payment confirmation
- Payment receipt review
- Reports retrieval
- Invoice dispute submission and resolution

\* Invoice payment deferment occurs under limited circumstances and is detailed in the ***CGDP Sponsor Portal Payments Users Guide***.

## CGDP Portal Roles

The CGDP Portal contains two access roles for Sponsors:

- Payment Initiator role
- Administrator role

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

- Users assigned the Payment Initiator role will have access to all functionality in the CGDP 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 initial security setup.
- Users assigned the Administrator role will have access to all functionality, except payment initiation authorization.

If these roles require separate associates to perform these functions, the Payment Initiator should be listed as the Coverage Gap Discount Program (CGDP) Payment Contact in HPMS.

Detailed instructions for initial security setup and an introduction to the CGDP Portal functionality reside in the ***CGDP Sponsor Portal Introduction and Login Users Guide***.



## CGDP Portal via TPAdministrator.com

CGDP program participants can access the CGDP Portal via the TPA website:  
<https://www.tpadadministrator.com>.

Once at the website, select the **CGDP Portal** graphic link on the Home Page (outlined in red).

Users can also access the **CGDP Portal** by selecting either the Topics menu or the Tools menus (both outlined in red).

Even the Archives page link in the upper right hand corner (underlined in red) has a **CGDP Portal** graphic link for access.

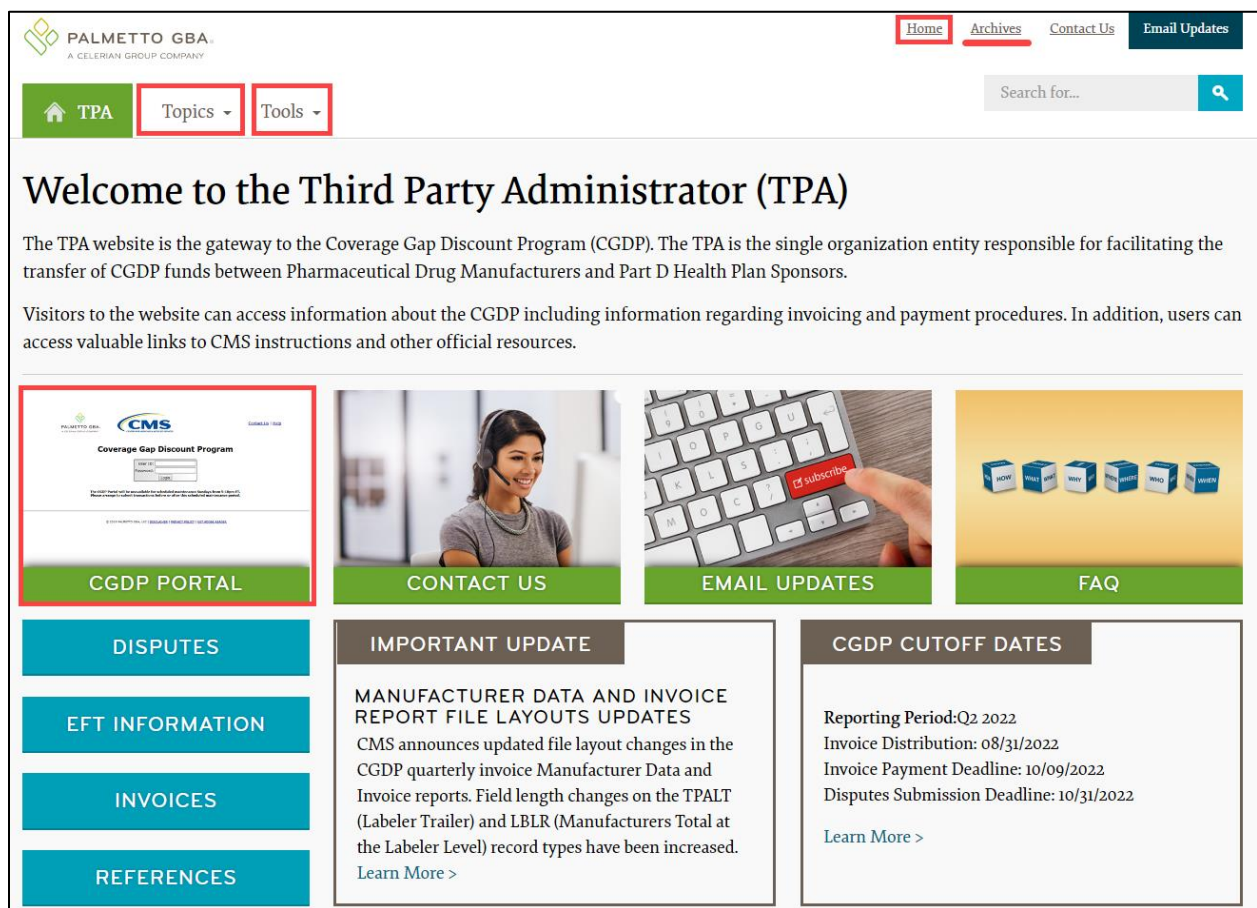


Figure 15: CGDP Portal Link

### CGDP Sponsor Portal Users Guides via TPAdministrator.com

CGDP program participants can access the CGDP Sponsor Portal Users Guides via the TPA website <https://www.tpadadministrator.com>.

Once on the site, there are two (2) ways to access the **References** link. One is a box text link located on the lower left side of the page under the graphic picture links (outlined in red). The second is located under the Topics menu (outlined in red).

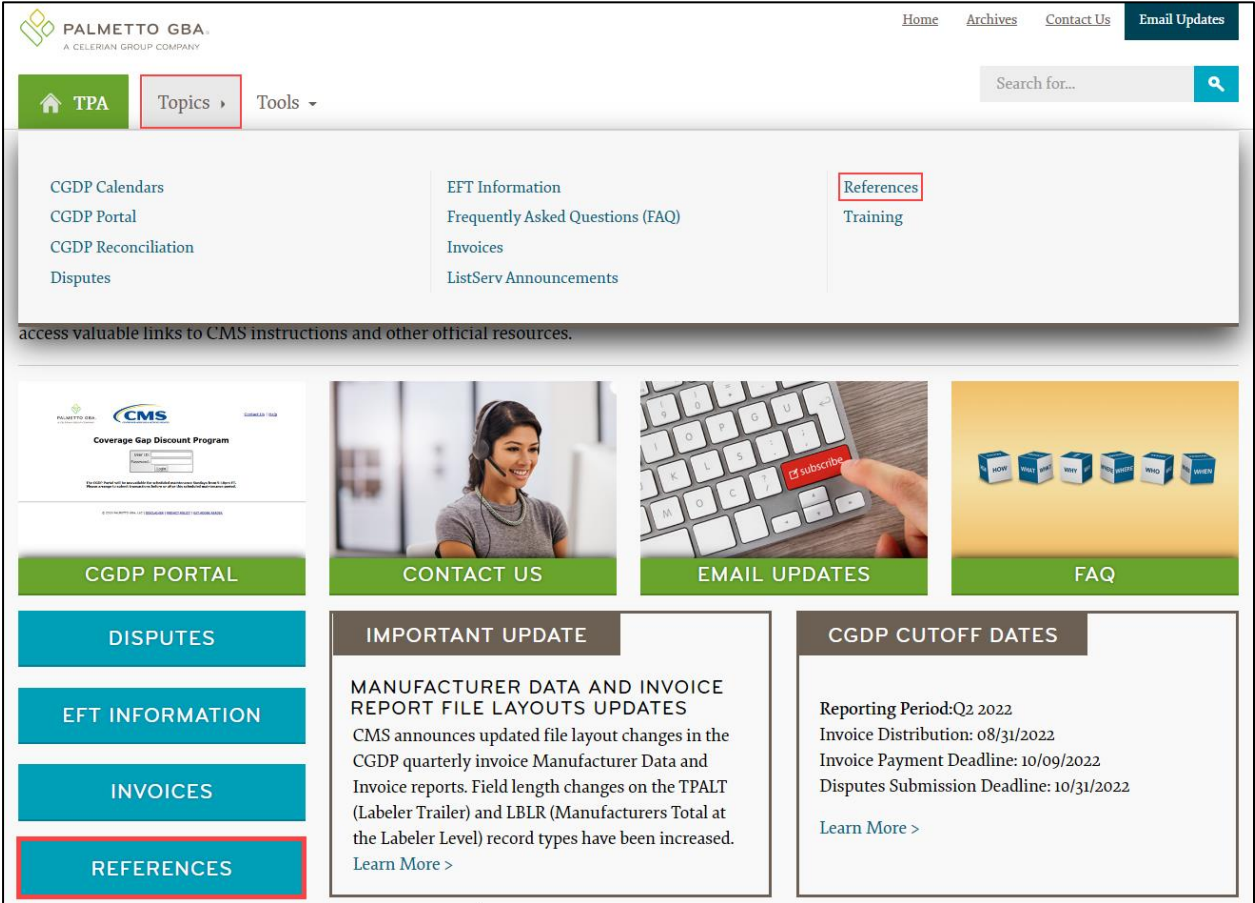


Figure 16: References Link on the TPAdministrator.com Website



Once the *References* topic displays, select **CGDP Sponsor Portal Users Guides** and review the four (4) topic specific manuals available.

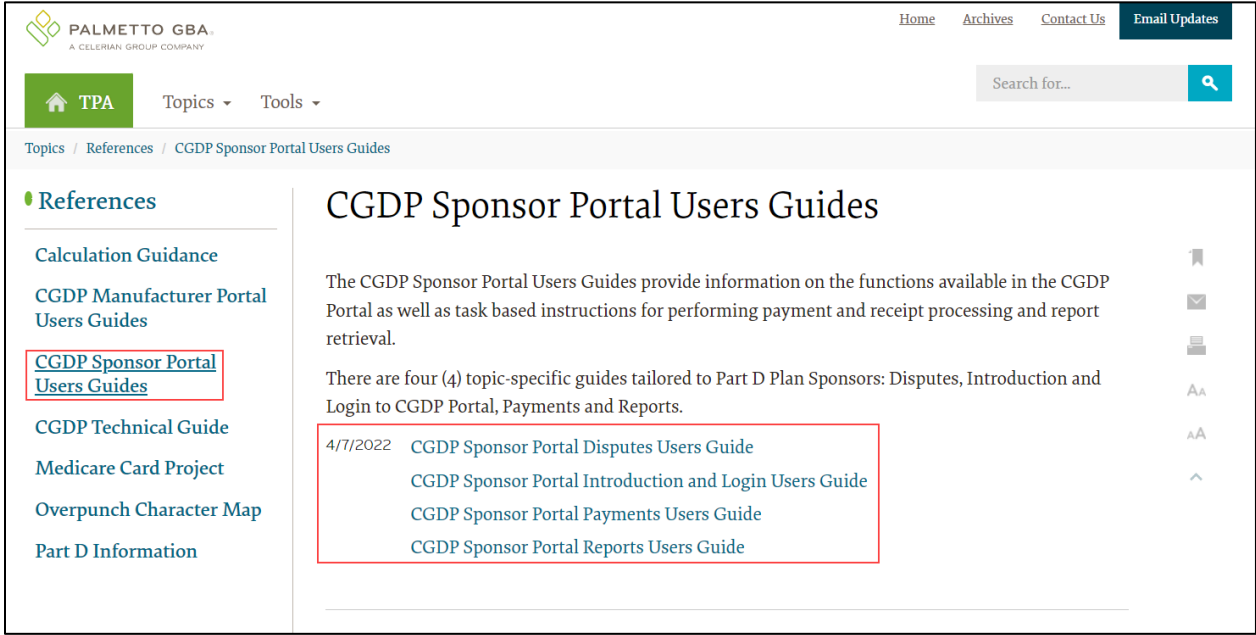


Figure 17: CGDP Sponsor Portal Users Guides location

## Accessing the CGDP Portal

For daily access, authorized users will access the CGDP Portal via the Login form.

- The User ID is the Parent Organization ID for Sponsors
- HPMS-assigned Manufacturer TPA Liaison or Coverage Gap Discount Program (CGDP) Payment Initiator personnel are sent a temporary password for initial access and are responsible for changing and maintaining their permanent password every 30 days
- Sponsors associates are assigned one of two roles for access to the CGDP Portal: Payment Initiator or Administrator
- All Quarterly and Benefit Year (BY) Closeout invoice and report data for Sponsors is loaded to the Portal for access and review by Payment Initiator and Administrator role associates
- Only associates assigned the Coverage Gap Discount Program (CGDP) Payment Initiator will be allowed to process Program invoice payments in the CGDP Portal.

Detailed instructions for accessing the CGDP Portal reside in the ***CGDP Sponsor Portal Introduction and Login Users Guide***.

## Email Verification

First time users will be required to verify their email address to allow receipt of User Validation authentication tokens required to access and use the CGDP Portal.

Once a user is authorized to access the CGDP Portal, they will receive an email from [tpa.no.reply@palmettogba.com](mailto:tpa.no.reply@palmettogba.com) titled “TPA CGDP Portal – Email Verification”.

The authorized user is required to select the link, provided in the email, to verify their email address prior to logging into the CGDP Portal.

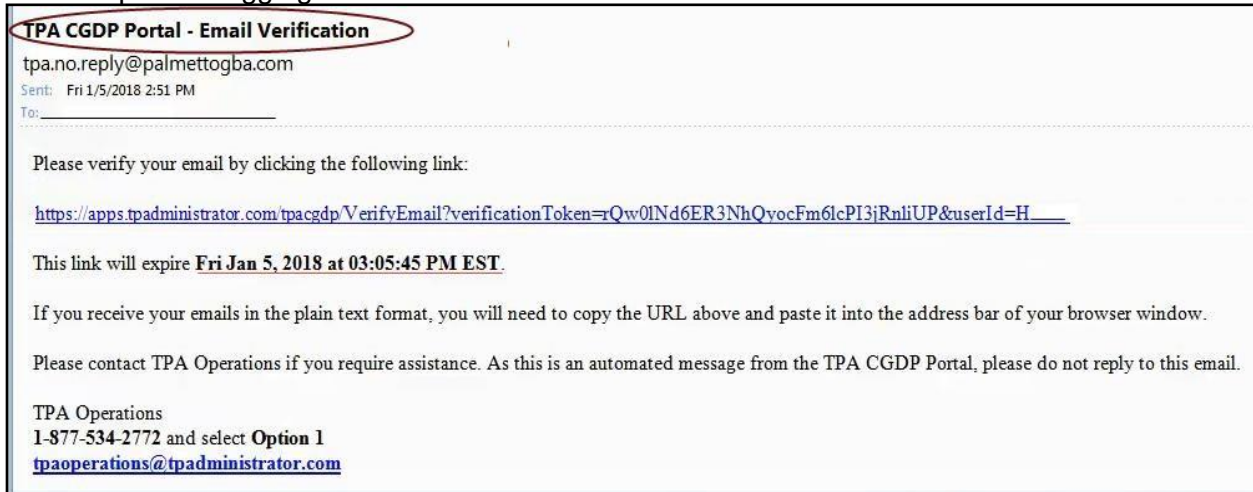


Figure 18: Example of a TPA CGDP Portal – Email Verification

## Multifactor Authentication

Once the **Multifactor Authentication – Email Verification Success** screen displays, the user will select the “*Please click here to log into the Portal!*” link provided on the page.



Figure 19: Multifactor Authentication – Email Verification Success Message

After selecting the *“Please click here to log into the Portal”* the CGDP Portal Login page will appear, and authorized users will enter their assigned user ID in the User ID field and the corresponding temporary password into the Password field on the **Login form** and select the *Login* button.

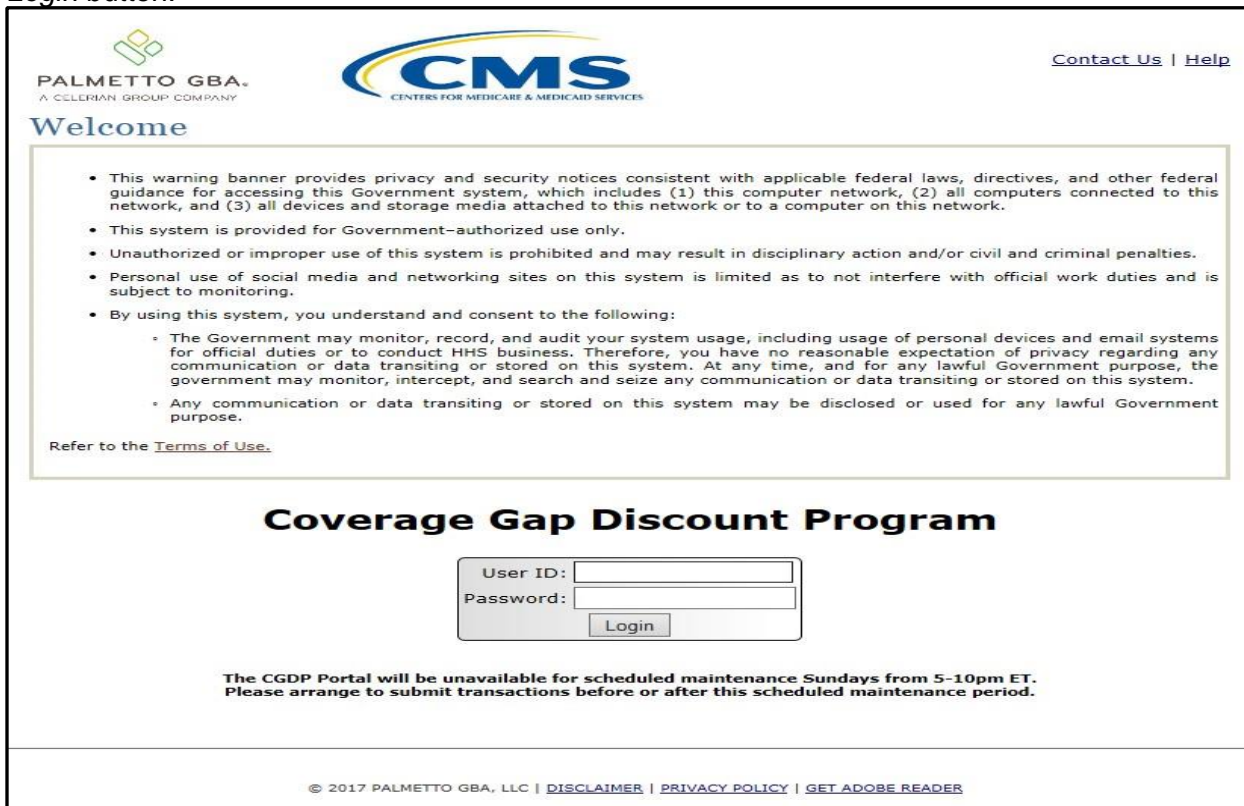


Figure 20: CGDP Portal Login Page

### User Validation Form

After entering the User ID and Password successfully, the User Validation form will display and require the entry of a Multifactor Authentication (MFA) token.



Figure 21: User Validation Form

The authorized user will receive an email from [tpa.no.reply@palmettogba.com](mailto:tpa.no.reply@palmettogba.com) titled “*TPA CGDP Portal – Portal Authentication*”. The authorized user will be required to enter the verification code, provided in the email, into the **Authentication Token** field in the CGDP Portal.

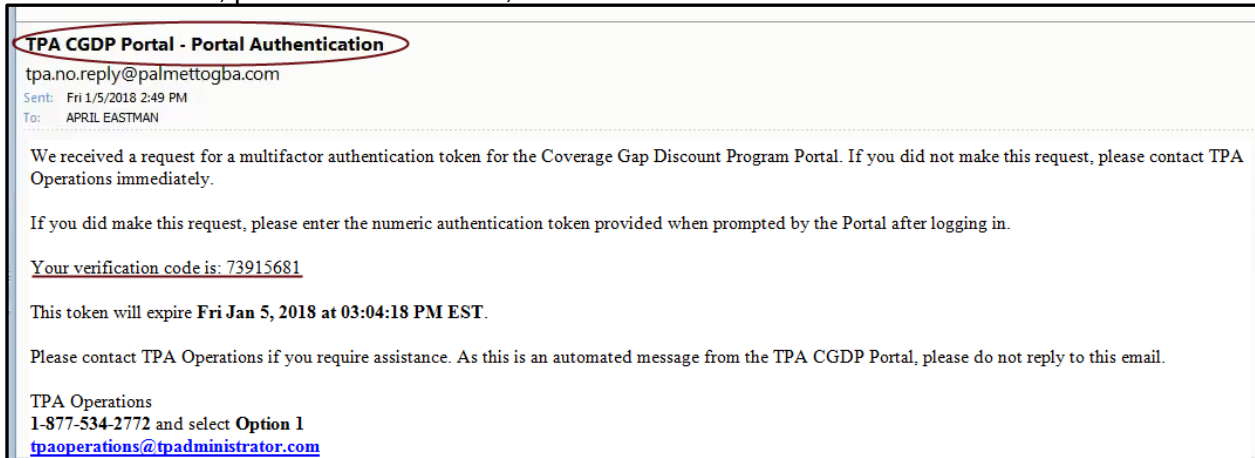


Figure 22: CGDP Portal Authorization MFA Token Email

After entering the MFA token sent to the user’s verified email, the user will select the Validate button.

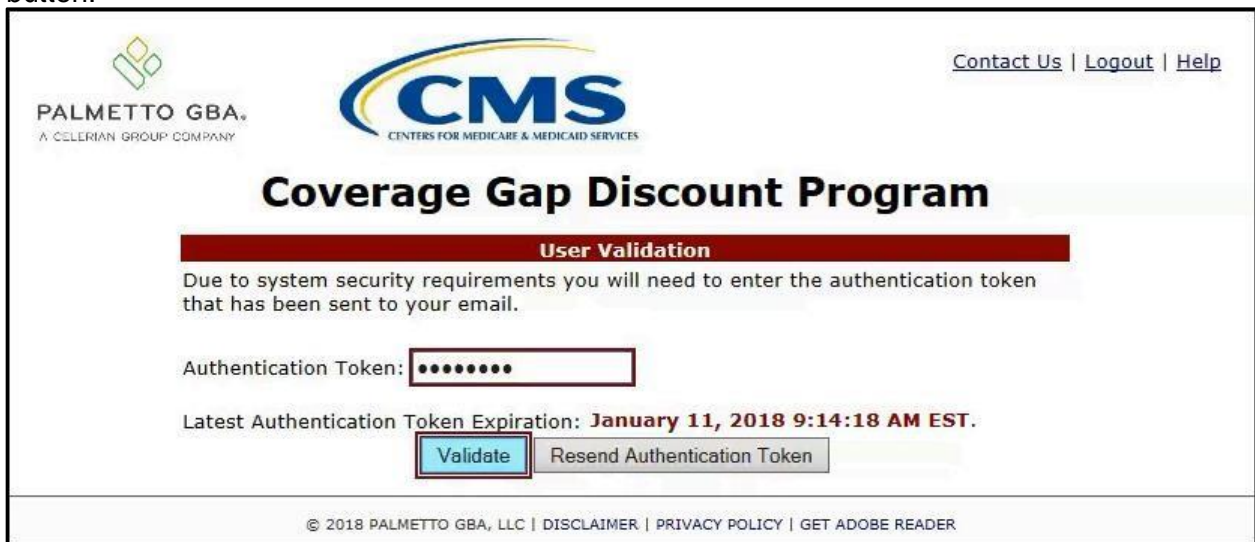


Figure 23: Completed User Validation Form with Validate Button Highlighted

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

**Parent Org. ID**    **Invoice Type**    **Contract Number**    **Reporting Period**    **Status**    1 - 2 out of 2

H\_\_\_\_\_    Quarterly    S5\_\_\_\_\_    ALL    ALL

Invoice Type	Contract Number	Reporting Period	Status	Select
Quarterly	S_____	201503	N/A	<input type="radio"/>
Quarterly	S_____	201502	Successful	<input type="radio"/>

**Reporting Periods with no invoice line items**  
 Filter by:    Contract Number: ALL    Reporting Period: ALL

**Contract Number**    **Reporting Period**

There is an invoice report for the selected Contract

Figure 24: CGDP Sponsor Portal Home Tab

Detailed instructions for accessing the Portal reside in the **CGDP Sponsor Portal Introduction and Login Users Guide**.

## Initiating Payments

### Quarterly Invoice Payments

The CGDP Portal Payments tab allows a user to review and process payment information for quarterly invoice line items by Manufacturer P Number for Sponsors.

- 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

Sponsors 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\*

\* Invoice payment deferment occurs under limited circumstances and is detailed in the ***Sponsors Portal Payments Users Guide***.



The screenshot displays the 'Sponsor Portal CGDP Payments' interface. At the top, there are logos for Palmetto GBA and CMS, along with navigation links and a login status. The main navigation bar includes 'Home', 'Payments' (highlighted), 'Completed', 'Receipts', 'Reports', and 'Disputes'. Below this, the 'Sponsor Portal CGDP Payments' title is shown. A filter region (4) includes 'P Number' (set to ALL), 'Parent Org. ID' (H0\_\_0), and 'Contract Number' (H0\_\_0). A reporting period (2) is set to 201503, and payments are due (3) on 12/09/2015. A 'Payment Information' summary (5) shows totals for Invoiced, Failed, Deferred, Pending, Successful, and Available amounts. A table (6) lists payment details for two invoices (P1\_\_7), including Invoiced Amount, Previous Deferred Amount, Payment/Failed Date, and EFT ID. A 'Payment Initiation Upload' region (7) has a 'Browse...' button and an 'Upload' button. A 'Pending Transactions' region (9) shows no pending items. An 'Error Description' list (8) includes codes R01 through R11.

Figure 25: CGDP Sponsor Portal Payments Tab – Quarterly Invoices

The **Payments** tab contains multiple regions for Quarterly Invoices:

- (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 P 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 Error Description region provides a listing of error codes that will appear in the Failed column in the Invoice Reporting region.
- (9) The Pending Transactions region displays invoice line items that are pending payment processing

Detailed instructions for processing Payments reside in the **CGDP Sponsor Portal Payments Users Guide**.



## Benefit Year (BY) Closeout Invoice Payments

The CGDP Portal Payments tab allows a user to review and process upheld dispute payment information for BY Closeout invoice line items by Manufacturer P Number for Sponsors.

- Payments can only be made via the CGDP Portal
- Payment amounts automatically populate from the invoice and are not subject to modification
- Payments must be paid no later than 38 days after the distribution of the invoice

These payment functions are available for BY Closeout invoice processing in the 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\*

The screenshot shows the 'Sponsor Portal CGDP Payments' interface. At the top, there are logos for Palmetto GBA and CMS. A navigation bar includes 'Home', 'Payments' (highlighted), 'Completed', 'Receipts', 'Reports', and 'Disputes'. The main content area is titled 'Sponsor Portal CGDP Payments' and includes several key elements:

- Filters:** Reimbursement Report Year: 2016, Payments due: 08/19/2016. Filter criteria include P Number (ALL), Parent Org. ID (H8\_4), and Contract Number (H8\_4).
- Payment Information Summary:**

Total Invoiced	\$3,897.86
Total Failed	\$0.00
Total Current Deferred	\$0.00
Total Previously Deferred	\$0.00
Total Pending	\$0.00
Total Successful	\$0.00
Total Available	\$3,897.86
- Table of Invoices:**

P Number	Invoiced Amount	Previous Deferred Amount	Payment/Failed Date	Initiate Payment	Defer	Failed	EFT ID
P1_6	\$3,897.86	\$0.00	06/20/2016	<input checked="" type="checkbox"/>			UD20161_6H8_4
- Error Description:**
  - R01 Insufficient Funds
  - R02 Account Closed
  - R03 Unable to Locate Account
  - R04 Invalid Account Number
  - R05 Unauthorized Corporate Debit
  - R06 Returned per ODFI's Request
- Pending Transactions:** A table with columns for P Number, Authorization Amt, Date Submitted, Payment Date, and Stop Payment. A message states: 'There are no pending transactions at this time.'

Figure 26: Benefit Year (BY) Closeout Payments Tab – BY Closeout Invoices

The Sponsor **Payments** tab contains eight (8) regions for Benefit Year (BY) Invoices:

- (1) The Tabbed region displays the active tab
- (2) The Reimbursement Report Year region displays to the calendar year BY Closeout invoices are distributed
- (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 P Number and Invoiced Amount and/or Previous Deferred Amount

- (7) The Error Description region provides a listing of error codes that will appear in the Failed column in the Invoice Reporting region.
- (8) The Pending Transactions region displays invoice line items that are pending payment processing

Detailed instructions for processing Payments reside in the ***CGDP Sponsor Portal Payments Users Guide***.

# Reporting

## Invoice Reports

Are:

- Distributed quarterly to Sponsors via the CGDP Portal
- Provides gap discount amounts summarized into invoices based on P Number
- Quarterly and Benefit Year (BY) Closeout invoice reports are available

Detailed instructions for downloading Invoice reports in the CGDP Portal reside in the **CGDP Sponsor Portal Reports Users Guide**.

### Quarterly Invoice Reports

Sponsors can utilize the CGDP Portal to view summary reports of 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 invoices and provides the ability to download the information for review.

The screenshot shows the 'Sponsor Portal CGDP Reports' interface. At the top, there are logos for Palmetto GBA and CMS, along with navigation links like 'Contact Us', 'My Profile', 'Logout', 'Help', and 'Reporting'. The user is logged in as 'H4\_\_3' in a 'Test Environment'. A navigation bar includes 'Home', 'Payments', 'Completed', 'Receipts', 'Reports' (highlighted with a red box), and 'Disputes'. Below this, the 'Report Type' section has radio buttons for 'Invoice' (checked), 'Data', 'Tracking', 'Batch', 'Manufacturer 1099 Information', and 'Ad Hoc'. A filter box contains 'Parent Org. ID' (H4\_\_3), 'Contract Number' (ALL), 'Reporting Period' (ALL), and 'Invoice Type' (Quarterly, highlighted with a red box). To the right, a 'Current Cutoff Calendar' box lists dates for Reporting Period (2016), Invoice Paid By (08/23/2016), Invoice Distribution (07/15/2016), Dispute Submission, and Dispute Distribution. At the bottom, a table displays the following data:

Invoice Type	Contract Number	Reporting Period	Date Loaded	Download File	Last Download Date
Quarterly	H4__3	201502	07/05/2016	<input type="radio"/>	

Figure 27: Quarterly Invoice Reports

**Benefit Year (BY) Closeout Invoice Report**

Sponsors can utilize the CGDP Portal to view BY Closeout invoice summary reports of upheld dispute invoices due to Manufacturers. The Contract Reimbursement Summary Report allows Sponsors to identify any amounts owed to the Manufacturer for upheld disputes by specific P numbers and by benefit year.

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 BY Closeout invoices and provides the ability to download the information for review.

The screenshot shows the 'Sponsor Portal CGDP Reports' interface. At the top, there are logos for Palmetto GBA and CMS, along with navigation links like 'Contact Us', 'My Profile', 'Logout', 'Help', and 'Reporting'. The user is logged in as 'H4\_\_3' in a 'Test Environment'. A navigation bar contains 'Home', 'Payments', 'Completed', 'Receipts', 'Reports' (highlighted with a red box), and 'Disputes'. Below this, the 'Report Type' section has radio buttons for 'Invoice' (selected), 'Data', 'Tracking', 'Batch', 'Manufacturer 1099 Information', and 'Ad Hoc'. A filter bar shows 'Parent Org. ID' as 'H4\_\_3', 'Contract Number' as 'ALL', 'Reporting Period' as 'ALL', and 'Invoice Type' as 'BY Closeout' (highlighted with a red box). To the right, a 'Current Cutoff Calendar' box lists: Reporting Period (2016), Invoice Paid By (08/23/2016), Invoice Distribution (07/15/2016), Dispute Submission, and Dispute Distribution. At the bottom, a table displays the following data:

Invoice Type	Contract Number	Reporting Period	Date Loaded	Download File	Last Download Date
BY Closeout	H4__3	2016	07/06/2016		

Figure 28: Benefit Year (BY) Closeout Invoice Reports

### Data Reports

Are:

- Distributed quarterly to Sponsors via the CGDP Portal
- Provides Sponsors the opportunity to review inputs to the invoice
- Incorporates changes in subsequent quarters due to adjustments or deletions of PDEs
- Quarterly and BY Closeout invoice reports are available

Detailed instructions for downloading Data reports in the Portal reside in the **CGDP Sponsor Portal Reports Users Guide**.

### Quarterly Data Report

Sponsors can utilize the CGDP Portal to view detailed data reports for distributed invoice line items that provides a user with reports containing detail information of the PDE's combined to create the total invoice line item amount distributed to the Sponsor.

The screenshot shows the 'Sponsor Portal CGDP Reports' interface. At the top, there are logos for Palmetto GBA and CMS, along with navigation links like 'Contact Us', 'My Profile', 'Logout', 'Help', 'Reporting', and 'Admin Menu'. The user is logged in as 'XHK7' in a 'Test Environment'. A navigation bar includes 'Home', 'Payments', 'Completed', 'Receipts', 'Reports' (highlighted with a red box), and 'Disputes'. Below this, the 'Report Type' section has radio buttons for 'Invoice', 'Data' (selected), 'Tracking', 'Batch', 'Manufacturer 1099 Information', and 'Ad Hoc'. A filter section includes dropdowns for 'Parent Org. ID' (H2\_\_2), 'Contract Number' (ALL), 'Reporting Period' (ALL), and 'Invoice Type' (Quarterly, highlighted with a red box). A 'Current Cutoff Calendar' box shows dates for 2016: Reporting Period (07/15/2016), Invoice Paid By (08/19/2016), Invoice Distribution (07/15/2016), Dispute Submission, and Dispute Distribution. A table at the bottom lists three quarterly reports for 201504, each with a 'Download File' and 'Download Spreadsheet' option.

Invoice Type	Contract Number	Reporting Period	Date Loaded	Download File	Last Report Downloaded Date	Download Spreadsheet	Last Spreadsheet Downloaded Date
Quarterly	H2__2	201504	12/31/2015	<input type="radio"/>		<input type="radio"/>	
Quarterly	H2__2	201504	12/31/2015	<input type="radio"/>		<input type="radio"/>	
Quarterly	S3__0	201504	12/31/2015	<input type="radio"/>		<input type="radio"/>	

Figure 29: Quarterly Invoice Reports

**Benefit Year (BY) Closeout Data Report**

Sponsors can utilize the CGDP Portal to view detail data reports for BY Closeout invoice line items. The Contract Reimbursement Detail Report will inform the contract of any gap discount payments due to the Manufacturer for upheld disputes from Quarter 17 or previous quarters.

The Contract Reimbursement Detail Report only reports on upheld disputes in which the action taken by the Sponsor to resolve the dispute resulted in a partial or full repayment of the disputed gap discount amount and the respective gap discount amount has not been previously invoiced for Sponsor payment to the Manufacturer.

The screenshot shows the CMS Sponsor Portal interface. At the top, there are logos for Palmetto GBA and CMS, along with navigation links and user information. A menu bar includes 'Home', 'Payments', 'Completed', 'Receipts', 'Reports' (highlighted with a red box), and 'Disputes'. Below the menu, the page title is 'Sponsor Portal CGDP Reports'. There are filters for 'Report Type' (Invoice, Data, Tracking, Batch, Manufacturer 1099 Information, Ad Hoc) and a search box. A 'Current Cutoff Calendar' box shows reporting details for 2016. A table at the bottom lists reports, with one entry for 'BY Closeout' and a download icon.

Invoice Type	Contract Number	Reporting Period	Date Loaded	Download File	Last Report Downloaded Date	Download Spreadsheet	Last Spreadsheet Downloaded Date
BY Closeout	H4__5	2016	07/06/2016				

Figure 30: BY Closeout Data Reports

## Tracking Report

Are:

- Distributed annually to Sponsors via the CGDP Portal
- Report that provides the history of each Gap Discount PDE saved in the CMS database and all activity associated with the invoice, such as adjustments performed in response for upheld Manufacturer disputes
- Tracking reports will include multiple benefit years

Detailed instructions for downloading Tracking reports in the Portal reside in the **CGDP Sponsor Portal Reports Users Guide**.

## Invoice Tracking Report

Sponsors can utilize the CGDP Portal to view reports of invoice line item history.

The Invoice Tracking Report provides Sponsors with the history of each Gap Discount PDE saved in the CMS database and all activity associated with the invoice, such as adjustments performed in response for upheld Manufacturer disputes.

The screenshot shows the 'Sponsor Portal CGDP Reports' page. At the top, there are logos for Palmetto GBA and CMS. A navigation bar includes 'Home', 'Payments', 'Completed', 'Receipts', 'Reports' (highlighted with a red box), and 'Disputes'. Below the navigation bar, there are filter options for 'Report Type' (Invoice, Data, Tracking, Batch, Manufacturer 1099 Information, Ad Hoc) and a 'Current Cutoff Calendar' box. A search filter section includes 'Parent Org. ID' (H0\_0), 'Contract Number' (ALL), 'Reporting Period' (ALL), and 'Invoice Type' (ALL). Below the filters is a table with columns: Invoice Type, Contract Number, Reporting ID, Date Loaded, Download File, and Last Downloaded Date.

Invoice Type	Contract Number	Reporting ID	Date Loaded	Download File	Last Downloaded Date
Quarterly	S5_2	201214	10/21/2015	<input type="radio"/>	
Quarterly	S5_8	201214	10/21/2015	<input type="radio"/>	
Quarterly	S5_2	201117	10/21/2015	<input type="radio"/>	
Quarterly	S5_8	201117	10/21/2015	<input type="radio"/>	

Figure 31: Invoice Tracking Report



## Batch Reports

Are:

- Generated when the Batch Upload Payment Process is utilized to process payment initiations.
- Detailed instructions for utilizing the Batch Upload Payment Process functionality reside in the **CGDP Sponsor Portal Payments Users Guide**.

Downloading Batch reports in the CGDP Portal reside in the **CGDP Sponsor Portal Reports Users Guide**.

Sponsors can 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 can view batch file status for successful processing, partially or totally rejected batch file uploads, and review errors associated with rejected records.

The screenshot shows the 'Sponsor Portal CGDP Reports' interface. At the top, there are logos for Palmetto GBA and CMS, along with navigation links like 'Contact Us', 'My Profile', 'Logout', 'Help', and 'Reporting'. The user is logged in as 'H0\_\_0'. The 'Reports' tab is selected in the navigation bar. Below the navigation, there are filters for 'Report Type' (Batch is selected), 'Parent Org. ID' (H0\_\_0), 'Contract Number', 'Reporting Period' (ALL), and 'Invoice Type' (ALL). A 'Current Cutoff Calendar' box shows dates for Reporting Period, Invoice Paid By, Invoice Distribution, Dispute Submission, and Dispute Distribution. The main content is a table of batch reports.

Parent Org. ID	Submission Date	Status	Download File	Last Download Date
H0__0	Submitted at 03/11/2016 @ 10:57 AM	Successfully processed	<input type="radio"/>	
	Submitted at 03/11/2016 @ 10:55 AM	Totally Rejected	<input type="radio"/>	03/11/2016 @ 10:55 AM
	Submitted at 09/11/2015 @ 4:12 PM	Partially Rejected	<input type="radio"/>	09/11/2015 @ 4:12 PM
	Submitted at 09/11/2015 @ 4:11 PM	File rejected: Invalid Header record	<input type="radio"/>	
	Submitted at 08/13/2015 @ 4:18 PM	Successfully processed	<input type="radio"/>	02/24/2016 @ 11:10 AM
	Submitted at 08/13/2015 @ 4:09 PM	Totally Rejected	<input type="radio"/>	
	Submitted at 08/13/2015 @ 1:30 PM	Primary Id and logon do not match	<input type="radio"/>	08/13/2015 @ 2:25 PM

Figure 32: Batch Reports



### 1099 Information Reports

Are:

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

Detailed instructions for downloading 1099 reports reside in the CGDP Portal in the **CGDP Sponsor Portal Reports Users Guide**.

Sponsors can utilize the CGDP Portal to review the Manufacturer 1099 Information report, which provides non-bank account information for Sponsors to utilize for tax reporting purposes.



Figure 33: Manufacturer 1099 Information Reports

### AD Hoc Reports

Sponsors can utilize the CGDP Portal to review Ad Hoc report requests, which provide limited access to reports that are no longer available on the CGDP Portal.

Detailed instructions for requesting and viewing Ad Hoc reports reside in the CGDP Portal in the **CGDP Sponsor Portal Reports Users Guide**.

The screenshot shows the 'Sponsor Portal CGDP Reports' interface. At the top, there are logos for Palmetto GBA and CMS, along with navigation links like 'Contact Us', 'My Profile', 'Logout', 'Help', and 'Reporting'. The user is logged in as 'S1...0' in a 'Test Environment'. A navigation bar contains tabs for 'Home', 'Payments', 'Completed', 'Receipts', 'Reports' (highlighted with a red box), and 'Disputes'. Below the navigation bar, the 'Report Type' section has radio buttons for 'Invoice', 'Data', 'Tracking', 'Batch', 'Manufacturer 1099 Information', and 'Ad Hoc' (which is selected). There are input fields for 'Parent Org. ID' (S1...0) and 'Contract Number' (ALL). A 'Current Cutoff Calendar' box displays: Reporting Period: 2017, Invoice Paid By: 08/26/2017, Invoice Distribution: 07/19/2017, Dispute Submission, and Dispute Distribution. At the bottom, a table lists report data:

Contract Number	Reporting Period	Report Type	Date Loaded	Download File	Last Downloaded Date
H0...4	201501	Invoice	07/25/2017		

Figure 34: Ad Hoc Reports

## Disputes Process

The CGDP Portal provides Sponsors with the ability to review Manufacturer dispute filings and their subsequent determinations.

The Disputes tab allows Sponsors the ability to review the Dispute Resolution Report

Sponsors have 90 days from discovery (date the dispute resolution file is distributed to Sponsors via the CGDP Portal) to submit a corrected PDE's to CMS

- Manufacturers can generally expect an adjustment for an upheld dispute usually within two invoicing cycles after the release of the dispute resolution file
- 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

## Disputes Tab

[Contact Us](#) | [My Profile](#) | [Logout](#) | [Help](#) | [Reporting](#)  
 PALMETTO GBA, A CELERIAN GROUP COMPANY | **CMS** CENTERS FOR MEDICARE & MEDICAID SERVICES | Logged on as H0\_\_0

Home | Payments | Completed | Receipts | Reports | **Disputes**

**Sponsor Portal Dispute Dashboard**

Parent Org. ID: H0\_\_0 Contract Number:  Reporting Period:

**Current Cutoff Calendar (Quarter 201504)**  
 Invoice Paid By: 03/10/2016 Dispute Submission: 04/01/2016  
 Invoice Distribution: 01/31/2016 Dispute Distribution: 06/08/2016

Resolution File	Download	Download Date	Reporting Period	Contract Number	Number Upheld	Number Denied	Total
Dispute_Resolution_R	<input type="radio"/>		201501	H0__0	0	17	17
Dispute_Resolution_R	<input type="radio"/>		201501	H0__9	0	5	5
Dispute_Resolution_R	<input type="radio"/>		201501	H1__5	0	1	1
Dispute_Resolution_R	<input type="radio"/>	Last downloaded on 02/19/2016 @ 3:41 PM	201501	H2__8	0	3	3
Dispute_Resolution_R	<input type="radio"/>	Last downloaded on 07/23/2015 @ 3:25 PM	201402	H3__4	0	4	4

Figure 35: Disputes Tab

The Sponsors Disputes tab contains four regions:

- (1) The Tabbed region displays the active tab.
- (2) The Filter region - Disputes allows filtering of disputes by selected criteria.
- (3) The Current Cutoff Calendar region provides pertinent reporting period dates.
- (4) The Resolution File region displays Upheld and Denied dispute resolution files.

Detailed instructions for reviewing Dispute reports reside in the CGDP Portal in the **CGDP Sponsor Portal Disputes Users Guide**.

## Dispute File Format

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

- [Contract Dispute File](#)
- [Dispute Reasons \(Effective February 8, 2015\)](#)
- [Dispute Resolution Report File Layout \(Effective February 8, 2015\)](#)
- [Dispute Layout Side by Side Comparison](#)

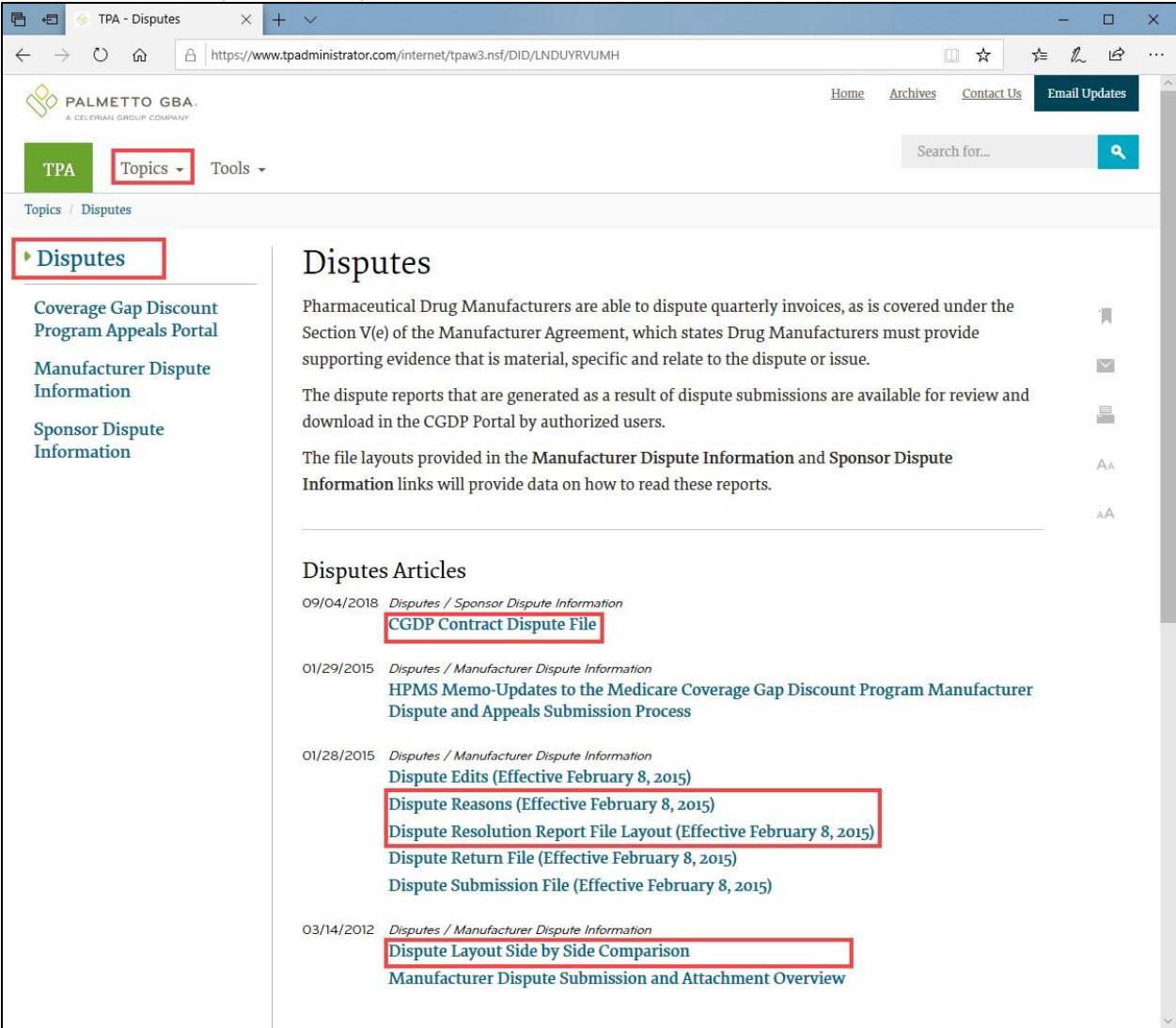


Figure 36: Disputes File Formats

## Contacting the TPA

The following provides information on how to contact the TPA Operations for questions with the Coverage Gap Discount Program (CGDP).

TPA website – <https://www.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](mailto:tpaoperations@tpadministrator.com)

Webinar Training

- Suggestions for webinar topics should be sent to [webinar@tpadministrator.com](mailto: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

- <https://www.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](mailto:CGDPandManufacturers@cms.hhs.gov)

### Discount Program Manufacturer's Page

- website: [Part D Information for Pharmaceutical Manufacturers | CMS](#)

### Independent Review Entity (IRE) for Discount Program appeals

- Website: <https://cgdp.pri-federal.com/>

### HPMS website for 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](mailto:CMS_IT_service_desk@cms.hhs.gov)

### CMS HPMS Non-Password access assistance

- Email: [CMSHPMS\\_access@cms.hhs.gov](mailto:CMSHPMS_access@cms.hhs.gov)



## Acronyms

Acronym	Definition
ACH	Automated Clearinghouse
BY	Benefit Year
CMS	Centers for Medicare and Medicaid Services
CGDP	Coverage Gap Discount Program
DDPS	Drug Data Processing System
EFT	Electronic Funds Transfer
EUA	Enterprise User Administration
HPMS	Health Plan Management System
IRE	Independent Review Entity
Manufacturer	Pharmaceutical Drug Manufacturer
MFA	Multifactor Authentication
PDE	Prescription Drug Event
Sponsor	Part D Health Plan Sponsor
TPA	Third Party Administrator