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MEMORANDUM

Date: November 20, 2007

To: All Part D Plan Sponsors

From: Cynthia G. Tudor, Ph.D., Director, Medicare Drug Benefit Group

Subject: Suppressible File Errors for Medicare Prescription Drug Plan Finder

This memo provides additional information supporting the October 31, 2007 memo regarding the Pricing File Suppression from the Medicare Prescription Drug Plan Finder (MPDPF). CMS is committed to ensuring that complete and accurate Part D information is reflected in this tool.

In order to oversee and monitor these data, CMS performs quality assurance tests on each data set submitted for the MPDPF. Due to the importance of having accurate data displayed for beneficiaries to make plan selections, CMS continues to identify issues that necessitate the suppression of pricing data on MPDPF. While CMS has communicated that Part D Sponsors must perform quality checks on their data, when possible, CMS will allow Part D Sponsors the opportunity to submit corrected data to avoid data suppression. Part D Sponsors, however, should be aware that suppression will occur if beneficiaries would be misled by incorrect data. Regardless of whether or not an error will result in suppression of data from MPDPF, Part D Sponsors must work diligently to investigate and resolve any issues identified in the quality assurance process. The information provided below is subject to change as new issues are identified or current issues change. Quality assurance issues that currently result in suppression of data include, but are not limited to, the following examples:

File	Type of Error	Description
EFF	Excluded FF NDC(s) deleted	A Part D Sponsor confirms that NDCs removed from the EFF indicate an unapproved negative formulary change.
EFF	Excluded FF with Reference NDC(s)	The Excluded Formulary File incorrectly contains Reference NDCs.
PC	Incorrect dispensing fees	Identification of pharmacies with erroneous dispensing fees.
PC	Pharmacy network errors	Identification of erroneous data in a Part D Sponsor's pharmacy network. For example, inclusion of pharmacies in the PC file that are not part of a Part D Sponsor's network.
PF	Incorrect pricing data	Identification of erroneous data in a Part D Sponsor's pricing information. Two examples are NDCs' unit costs to be outside of AWP and median thresholds, or brand-name drugs being priced incorrectly at or below the generic equivalents. In these cases, data are suppressed if the Part D Sponsor cannot confirm the data reflect the prices a beneficiary can expect to pay.
PC & PF	Missing data files	A Part D Sponsor fails to submit required pricing files during a regular submission window, and cannot auto-certify that the data remains unchanged from the previous submission.
PC & PF	PC and PF mismatch	The Pharmacy Cost file submitted contains price file ids that have not been included in the submitted Price File.

EFF = Excluded drug formulary file; PC = Pharmacy cost; PF = Pricing file

We appreciate your cooperation in making sure Medicare beneficiaries have the most accurate data available from which to make an informed decision on plan selection. Questions regarding this information should be directed via email to Stacy Matheny: stacy.matheny@cms.hhs.gov, and Alice Lee-Martin: alice.leemartin@cms.hhs.gov.