

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



Medicare Plan Payment Group

DATE: October 24, 2011
TO: Pharmaceutical Manufacturers
FROM: Cheri Rice /s/
Director, Medicare Plan Payment Group

SUBJECT: Medicare Coverage Gap Discount Program Dispute Submission Process

This memo is to inform you of a change in the processing of disputes associated with the Coverage Gap Discount Program (Discount Program). Beginning with disputes submitted for second quarter 2011 invoices (due no later than October 31, 2011) manufacturers may include electronic documents in support of their disputes.

When the dispute process was developed for Quarter 1, 2011, (see, Dispute File Overview and Dispute File Layout Side by Side Compare documents at www.cssc.operations.com) CMS believed that the size of the field, at 736 positions, would be sufficient for manufacturers to provide the relevant information required. However, we received feedback from manufacturers of the need to include documents to support some of their disputes in addition to the use of the text field. We are therefore instituting a mechanism which will allow manufacturers to submit evidence germane to the dispute via email to the Third-Party Administrator (Palmetto). Manufacturers that have already submitted a second quarter dispute in advance of the October 31, 2011 deadline may submit appropriate supplemental documentation up to the deadline.

Manufacturers may submit supporting evidence for disputes via email attachment to cgdp_disputes@palmettogba.com. The subject line in the email must include the manufacturer's P number and the Detail Reference Number of the dispute. The document attached to the email must be in PDF format. Contact the TPA if you need assistance creating or converting your documents to PDF files. Examples of the type of document that may be submitted are Sales Reports, Drug Dosing Guidelines and other documentation, as appropriate. Per the Medicare Coverage Gap Discount Program Agreement Section V(e), all supporting evidence submitted must be material, specific, and related to the dispute or issue.

Please submit any questions about this process to csscooperations@palmettogba.com.