



Medicare Plan Payment Group

Date: August 16, 2012

To: Pharmaceutical Manufacturers

From: Cheri Rice, Director, Medicare Plan Payment Group

Subject: **Updates to the Manufacturer Dispute Resolution File Layouts to Accommodate the Inclusion of Multiple Benefit Years on a Single Invoice**

On April 30, 2012, the Centers for Medicare & Medicaid Services (CMS) announced updates to several Coverage Gap Discount Program related file layouts in an HPMS memorandum titled “Medicare Coverage Gap Discount Program – Reminder of Updates to the Manufacturer Invoice, Payment Confirmation, and Dispute File Layouts to Accommodate the Inclusion of Multiple Benefit Years on a Single Invoice.”

These updates are necessary because Prescription Drug Event records (PDEs) can be submitted up to three years following the date of service. For this reason, beginning with the Quarter 1 2012 invoice, each quarterly cycle could include data from more than one benefit year.

In this guidance, CMS is pleased to announce changes to the Dispute Resolution file layout to reflect multiple benefit years. The TPA uses the Dispute Submission file to create the Dispute Resolution Report so the updates that were made to the Dispute Submission file to account for the inclusion of multiple years on the invoice carryover to the Dispute Resolution file layout. These updates will allow manufacturers to receive one report per quarter containing the determinations on disputes submitted from multiple benefit years.

On the header and trailer records of the Dispute Resolution file, the TPAMH and the TPAMT records, in Field # 3 the Current Reporting Period field replaces the Report ID field. The Current Reporting Period field refers to the calendar year and quarter that the invoice was issued. Because this field is specific to the calendar year, the value reported for the quarter cannot exceed “04” (Quarter 4).

On the DETDR record, the Prior Low Income Discount Flag (formerly field #17) has been removed, in accordance with the change to our low volume policy. The DETDR also includes two new fields, Previous Reporting Period (field # 17) and Current Reporting Period (field #18). The Current Reporting Period carries over from the TPAMH record and identifies the calendar year and quarter that the invoice was issued. If the PDE on the current invoice represents an adjustment to a previously invoiced PDE, the Previous Reporting Period identifies the calendar year and quarter the original PDE was invoiced. Previous Reporting Period is also calendar year

specific and for this reason, the quarter cannot exceed Quarter 4. The addition of the Previous and Current Reporting Period fields shifts all of the fields that follow by 11 positions, including the Dispute Disposition, Dispute Resolution Code, and Dispute Resolution text fields.

Lastly, on the TPAMT record, the following fields have all been expanded in length from seven to eight positions: the Total Detail Record Count (field #8), the Total Detail Record Count – Upheld (field #9), the Total Detail Record Count – Denied (field #10), Total Detail Record Count – Denied, Rejected on Error (field #11), and Total Detail Record Count – Denied, Received After 60 Days (field #12). The expansion of these fields reduces the filler field at the end of the record by five positions.

The updated Dispute Resolution Report file layout can be found on the CSSC Operations website at www.csscoperations.com.