#### DEPARTMENT OF HEALTH & HUMAN SERVICES

Centers for Medicare & Medicaid Services 7500 Security Boulevard, Mail Stop C1-26-16 Baltimore, Maryland 21244-1850



#### **Center of Medicare**

August 22, 2014

VIA:

**EMAIL** (cgiroux@akrimax.com; arubino@akrimax.com)

Akrimax Pharmaceuticals, LLC Ms. Carrie Giroux, CFO 11 Commerce Drive, First Fl Cranford, NJ 07016

RE: Notice of Determination to Impose a Civil Money Penalty for Pharmaceutical Manufacturer Contract Number P1151

Dear Ms. Carrie Giroux:

Pursuant to 42 CFR §423.2335(d), the Centers for Medicare & Medicaid Services (CMS) is providing notice to Akrimax Pharmaceuticals, LLC that CMS has made a determination to impose a civil money penalty (CMP) in the amount of \$100,222.23.

### **Basis for Civil Money Penalty**

This action is based on your organization's failure to pay specified Part D sponsors within 38 calendar days of receipt of the quarterly invoice from the third party administrator, in violation of 42 CFR §423.2315(b)(3) and Section II(b) of the Medicare Coverage Gap Discount Program Agreement (Discount Agreement).

Based on the payment confirmation report provided by your organization and the payment confirmations provided by Part D sponsors, CMS has determined to impose a CMP of \$100,222.23 to Akrimax Pharmaceuticals, LLC due to untimely payments for the 2013 fourth quarter invoices. Specifically, the following Part D sponsors did not receive payments within the requisite 38-day time period:

• 170 Part D Sponsors \$400,888.93 (Breakdown on Attachment 2)

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The CMP that your company owes is equal to:

• 25% on the amount paid late, \$100,222.23

The determination by CMS to impose a CMP will become final and due no later than October 21, 2014 if you do not request a hearing to appeal in the manner and timeframe described below. Please see the required payment method below under Method to Submit CMP Payments.

Please note that any further failures by Akrimax Pharmaceuticals, LLC to comply with these or any other CMS requirements may subject your organization to termination as described in 42 CFR §423.2345 and section VIII of the Discount Agreement.

### Right to Request a Hearing

Your organization may request a hearing to appeal CMS' determination in accordance with Section VIII (c) of the Discount Agreement. You must send a written request for a hearing to the Departmental Appeals Board office listed below, and a copy to CMS at the address listed below, within 60 calendar days from receipt of this notice. Your request must be received no later than October 21, 2014. The request for a hearing must identify the specific issues, the findings of fact and conclusions of law with which you disagree, and specify the basis for each contention that the finding or conclusion of law is incorrect. Your request should be sent to:

Karen Robinson Civil Remedies Division Department of Health and Human Services Departmental Appeals Board Medicare Appeals Council, MS 6132 330 Independence Ave., S.W. Cohen Building Room G-644 Washington, D.C. 20201

A copy of your hearing request should also be sent to CMS at the following address:

Craig Miner
Deputy Director, Division of Part D Policy
Centers for Medicare & Medicaid Services
7500 Security Boulevard
MAIL STOP: C1-26-16
Baltimore, MD 21244

Email: <u>Craig.miner@cms.hhs.gov</u>

#### **Method to Submit CMP Payments**

All CMP payments must be made using Pay.gov (See Attachment for instructions). Pay.gov provides a free service to Federal government agencies and to the entities that make online payments to a Federal government agency. The Pay.gov Collection Service collects and processes the Internet-authorized

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deductions from a checking or savings account via Automated Clearing House (ACH) debit entries processed at the Federal Reserve Bank of Cleveland (FRB-C). Your Pay.gov payment transaction will not require a Username and Password in Pay.gov.

Companies sometimes have blocks on their bank accounts that will only allow designating transactions to be processed. It may be necessary to provide your banking institute with the following two pieces of information to unblock the bank account:

- Originating Depository Financial Institution (ODFI): FRB-C is the payment processor for ACH payments made through Pay.gov and will appear as the ACH ODFI. FRB-C processes Pay.gov ACH transactions under the American Bankers Association (ABA) routing numbers 041036046 and 042736141.
- **Company ID**: Every ACH batch contains a company ID number in accordance with the National Automated Clearing House Association (NACHA) requirements. CMS' company ID number for Pay.gov payments is 7505008012.

For Pay.gov technical issues contact Pay.gov Customer Service at (800) 624-1373 or (216) 579-2112, Monday–Friday from 6:00 A.M. to 7:00 P.M. Eastern Time.

You will find it helpful to have the following information available when you complete your payment:

- P# (P####)
- CMP payment demand letter from CMS
- Bank account and routing numbers
- Point of contact regarding the payment
- Business mailing address

Acknowledgement of this letter is required, please reply to <u>CGDPandManufacturers@cms.hhs.gov</u>. If you have any questions about this notice, please contact Sonia Eaddy at <u>Sonia.eaddy@cms.hhs.gov</u>.

Sincerely,

/s/

Amy K. Larrick Acting Director, Medicare Drug Benefit and C & D Data Group

cc: Ms. Cheri Rice, CMS/CM/MPPG

Mr. John Scott, CMS/CM/MPPG

Mr. Brian Cook, CMS/OC

Mr. Greg Jones, CMS/OL

Ms. Jill Abrams, DHHS/OGC

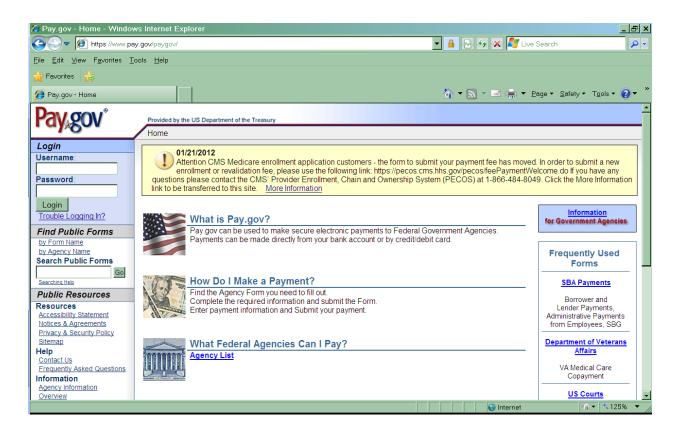
Ms. Jennifer Garver, DHHS/OGC

Ms. Karen Robinson, DHHS/DAB

### **Attachment 1**

### Step 1

Access Pay.gov at <a href="https://www.pay.gov">https://www.pay.gov</a>



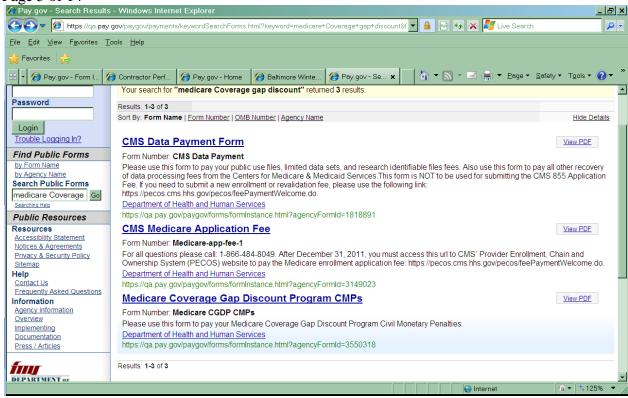
# Step 2

On the Pay.gov home page,

- In the **Search Public Forms** box (on the left side of the home page), Type: *Medicare Coverage Gap Discount (not case sensitive)*
- then click on Go

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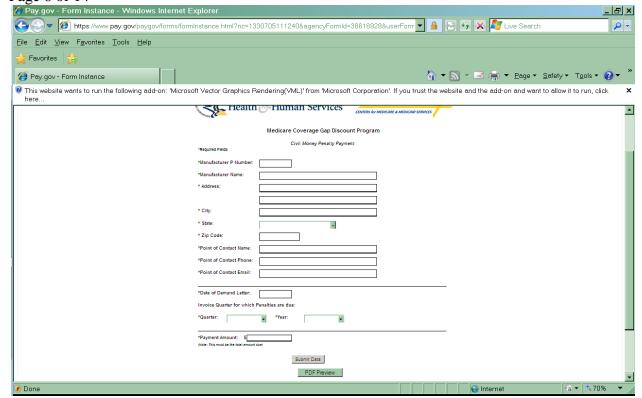
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# Step 3

Click on **Medicare Coverage Gap Discount Program CMPs** link. You will be taken to the civil money penalty collection form. Have available your payment demand letter from CMS.

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- Complete the required fields
  - Manufacturer P Number: (P####) must be a P followed by 4-digits
  - Manufacturer Name: manufacturer's complete name
  - **Point of Contact:** person authorized to make the payment
  - ° **Point of Contact Phone:** (\*\*\*-\*\*\*\*) telephone number must include dashes
  - Point of Contact Email: email address
  - ° Mailing address: Street, city, state, and zip code
  - Date of Demand Letter: (MM/DD/YEAR) typed date on the demand letter received from CMS
  - Ouarter: (Q1, Q2, Q3, Q4) use the drop arrow to select the calendar year quarter in which the invoice payment was late or unpaid
  - Year: use the drop down arrow to select the calendar year in which the invoice payment was late or unpaid
  - Payment Amount: the total amount indicated on the demand letter from CMS
- Review
- Click on Submit Data

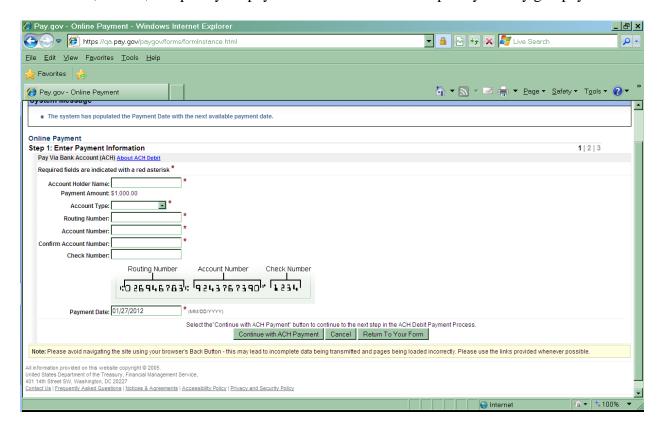
NOTE: You will immediately receive a message if **any** of the required information is missing on the payment form. Click OK, complete the missing information, and click on Submit Data.

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### Step 4

Have your banking information available to enter the payment information. Enter bank information, review, and print your payment confirmation to complete your Pay.gov payment.



- Enter Payment Information
  - Account Holder Name: name as it appears on the actual banking account

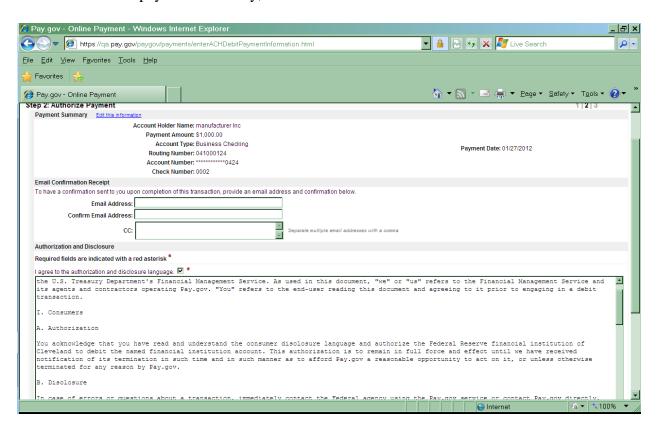
Notice the payment amount you entered on the previous screen has populated. Click on Return To Your Form to correct the payment amount.

- Account Type: (Personal Checking, Personal Savings, Business Checking, or Business Savings) use the drop down arrow to select account type
- Routing Number: bank routing number
- Account Number: bank account number
- ° Confirm Account Number: re-type your bank account number
- ° Check Number: check number used for this payment
- **Payment Date:** automatically populates the next available date in which the financial institutes can initiate the payment transaction

Continue with ACH Payment- will move you the next step of your payment Cancel- will cancel all information entered during this session Return To Your Form- will take you back to the Civil Money Penalty form

Note: You will be redirected to the Pay.gov home page to start a new session if you click on Continue with ACH Payment before the account information is entered.

• Review the payment summary,

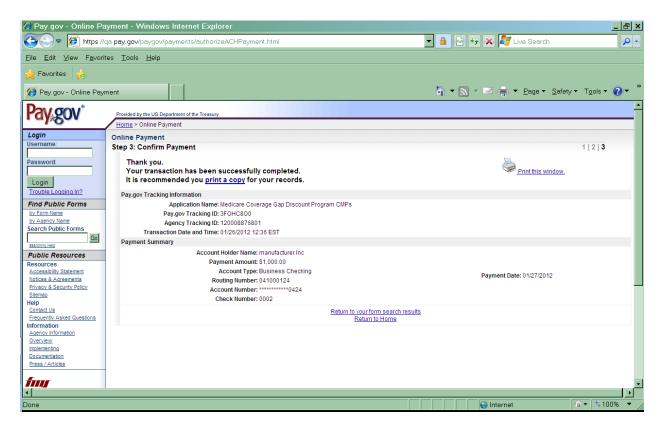


- Enter email address(es) to receive the payment confirmation
- ° Please add to the CC box: cgdp\_manufacturers@cms.hhs.gov
- ° Read and/or print the Authorization and Disclosure. If you agree, Click, *I agree to the authorization and disclosure language*

**Submit Payment-** will submit your payment and move you to the final step of your payment

Cancel- will cancel all information entered during this session Return To Your Form- will take you back to the Civil Money Penalty form

Print the payment confirmation.



# **Attachment 2**

	Contract Number	Contract Name	Invoiced Amount	
1	E2332	NATIONAL RURAL ELECTRIC	\$	24.64
2	E3014	PSERS HOP PROGRAM	\$	2,574.50
3	E4744	MO DOT AND MSHP MEDICAL	\$	788.23
4	E7848	OKLAHOMA STATE AND EDUC	\$	2,123.89
5	H0104	BLUE CROSS AND BLUE SHI	\$	217.10
6	H0154	VIVA HEALTH INC.	\$	152.66
7	H0303	PACIFICARE OF ARIZONA	\$	824.02
8	H0332	KS PLAN ADMINISTRATORS,	\$	581.55
9	H0354	CIGNA HEALTHCARE OF ARI	\$	548.70
10	H0401	UNITEDHEALTHCARE OF ARK	\$	121.92
11	H0504	CA PHYSICIANS SERV/DBA	\$	301.26
12	H0523	AETNA HEALTH OF CALIFOR	\$	903.16
13	H0524	KAISER FOUNDATION HP I	\$	2,739.34
14	H0543	PACIFICARE OF CALIFORNI	\$	1,406.56
15	H0544	CALIFORNIA HEALTH PLAN	\$	67.93
16	H0562	HEALTH NET OF CA	\$	1,257.76
17	H0602	ROCKY MOUNTAIN HEALTH P	\$	240.12
18	H0609	PACIFICARE OF COLORADO	\$	1,059.84
19	H0755	HEALTH NET OF CONNECTIC	\$	473.61
20	H1016	AVMED INC	\$	241.76
21	H1026	HEALTH OPTIONS INC	\$	12.45
22	H1036	HUMANA MEDICAL PLAN IN	\$	254.10
23	H1045	PREFERRED CARE PARTNERS	\$	121.44
24	H1080	UNITED HEALTHCARE OF FL	\$	93.72
25	H1110	AETNA LIFE INSURANCE CO	\$	1,067.66
26	H1302	BLUE CROSS OF IDAHO HLT	\$	567.76
27	H1350	BLUE CROSS OF IDAHO HEA	\$	112.52
28	H1509	UNITED HEALTHCARE INSUR	\$	2,032.21
29	H1666	HCSC INSURANCE SERVICES	\$	129.69
30	H1951	HUMANA HEALTH BENEFIT P	\$	914.87
31	H1961	TENET CHOICES INC./P	\$	427.88
32	H2150	KAISER FNDN HP OF THE M	\$	446.49
33	H2256	TUFTS ASSOCIATED HMO I	\$	388.04
34	H2312	HEALTH ALLIANCE PLAN OF	\$	513.96

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35	H2320	PRIORITY HEALTH	\$	247.39
36	H2425	BLUE PLUS	\$	68.62
37	H2450	MEDICA INSURANCE COMPAN	\$	3,288.74
38	H2459	UCARE MINNESOTA	\$	696.24
39	H2462	HEALTHPARTNERS	\$	715.89
40	H2663	GROUP HEALTH PLAN INC.	\$	95.43
41	H2667	MERCY HEALTH PLANS OF M	\$	403.97
42	H3107	OXFORD HEALTH PLANS (NJ	\$	96.03
43	H3152	AETNA HEALTH INC.	\$	577.36
44	H3154	HORIZON HEALTHCARE OF N	\$	418.10
45	H3251	LOVELACE HEALTH PLAN I	\$	30.22
46	H3307	OXFORD HEALTH PLANS (NY	\$	122.61
47	H3312	AETNA HEALTH INC.	\$	28.64
48	H3328	NEW YORK STATE CATHOLIC	\$	101.73
49	H3330	HIP HEALTH PLAN OF NY	\$	450.14
50	H3335	EXCELLUS HEALTH PLAN I	\$	71.47
51	H3342	EMPIRE HEALTHCHOICE ASS	\$	1,094.35
52	H3351	EXCELLUS HEALTH PLAN I	\$	685.68
53	H3362	INDEPENDENT HEALTH ASSO	\$	693.18
54	H3370	EMPIRE HEALTHCHOICE HMO	\$	492.28
55	H3404	PARTNERS NATIONAL HEALT	\$	30.15
56	H3449	PARTNERS NATIONAL HEALT	\$	1,197.31
57	H3619	HUMANA INSURANCE COMPAN	\$	533.58
58	H3653	PARAMOUNT CARE INC	\$	257.81
59	H3655	COMMUNITY INSURANCE COM	\$	170.06
60	H3660	SUMMACARE INC.	\$	1,090.01
61	H3664	MCKINLEY LIFE INSURANCE	\$	1,585.96
62	H3668	MT. CARMEL HEALTH PLAN	\$	2,302.49
63	H3749	PACIFICARE OF OKLAHOMA	\$	122.58
64	H3755	COMMUNITY CARE HMO INC	\$	831.90
65	H3815	CITIZENS CHOICE HEALTHP	\$	384.39
66	H3817	REGENCE BLUECROSS BLUES	\$	1,078.69
67	H3907	UNIVERSITY OF PITTSBURG	\$	765.31
68	H3916	HIGHMARK INC.	\$	5,941.90
69	H3923	CAPITAL ADVANTAGE INSUR	\$	131.41
70	H3924	GEISINGER INDEMNITY INS	\$	58.50
71	H3931	AETNA HEALTH INC	\$	306.38
72	H3952	KEYSTONE HEALTH PLAN EA	\$	1,283.57
73	H3957	KEYSTONE HEALTH PLAN WE	\$	657.15
74	H3959	HEALTHAMERICA PENNSYLVA	\$	86.68
75	H3962	KEYSTONE HEALTH PLAN CE	\$	424.32
76	H4003	MMM HEALTHCARE INC.	\$	1,802.91
77	H4005	TRIPLE-S INC.	\$	18.00
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80         H4102         UNITED HEALTH PLANS OF         \$           81         H4141         HUMANA EMPLOYERS         \$         2           82         H4152         BLUE CROSS SHIELD OF RI         \$         \$           83         H4456         JOHN DEERE HEALTH PLAN         \$         5           84         H4506         SELECTCARE OF TEXAS         \$         1           85         H4514         EVERCARE OF TEXAS LLC         \$           86         H4523         AETNA HEALTH INC.         \$           87         H4527         PSO HEALTH SERVICES LL         \$           88         H4590         PACIFICARE OF TEXAS IN         \$         3           89         H4875         PRIORITY HEALTH         \$         4           90         H5211         SECURITY HEALTH PLAN OF         \$         9           91         H5215         NETWORK HEALTH INSURANC         \$         3           92         H5422         BLUE CROSS BLUE SHIELD         \$         2           93         H5425         SCAN HEALTH PLAN         \$         2           94         H5426         METCARE HEALTH PLANS I         \$           95         H535         P	
80         H4102         UNITED HEALTH PLANS OF         \$           81         H4141         HUMANA EMPLOYERS         \$         2           82         H4152         BLUE CROSS SHIELD OF RI         \$         \$           83         H4456         JOHN DEERE HEALTH PLAN         \$         5           84         H4506         SELECTCARE OF TEXAS         \$         1           85         H4514         EVERCARE OF TEXAS LLC         \$           86         H4523         AETNA HEALTH INC.         \$           87         H4527         PSO HEALTH SERVICES LL         \$           88         H4590         PACIFICARE OF TEXAS IN         \$         3           89         H4875         PRIORITY HEALTH         \$         4           90         H5211         SECURITY HEALTH PLAN OF         \$         9           91         H5215         NETWORK HEALTH INSURANC         \$         3           92         H5422         BLUE CROSS BLUE SHIELD         \$         2           93         H5425         SCAN HEALTH PLAN         \$         2           94         H5426         METCARE HEALTH PLANS I         \$           95         H535         P	59.69
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82         H4152         BLUE CROSS SHIELD OF RI         \$           83         H4456         JOHN DEERE HEALTH PLAN         \$           84         H4506         SELECTCARE OF TEXAS         \$           85         H4514         EVERCARE OF TEXAS LLC         \$           86         H4523         AETNA HEALTH INC.         \$           87         H4527         PSO HEALTH SERVICES LL         \$           88         H4590         PACIFICARE OF TEXAS IN         \$           89         H4875         PRIORITY HEALTH         \$           90         H5211         SECURITY HEALTH PLAN OF         \$           91         H5215         NETWORK HEALTH PLAN OF         \$           91         H5215         NETWORK HEALTH INSURANC         \$           92         H5422         BLUE CROSS BLUE SHIELD         \$           93         H5425         SCAN HEALTH PLAN         \$           94         H5426         METCARE HEALTH PLANS I         \$           95         H5435         PACIFICARE LIFE AND HEA         \$           96         H5509         COVENTRY HEALTH AND LIF         \$           97         H5520         HEALTH NET LIFE INSURAN         \$	91.20
83         H4456         JOHN DEERE HEALTH PLAN         \$ 5           84         H4506         SELECTCARE OF TEXAS         \$ 1           85         H4514         EVERCARE OF TEXAS LLC         \$           86         H4523         AETNA HEALTH INC.         \$           87         H4527         PSO HEALTH SERVICES LL         \$           88         H4590         PACIFICARE OF TEXAS IN         \$ 3           89         H4875         PRIORITY HEALTH         \$ 4           90         H5211         SECURITY HEALTH PLAN OF         \$ 9           91         H5215         NETWORK HEALTH INSURANC         \$ 3           92         H5422         BLUE CROSS BLUE SHIELD         \$ 2           93         H5425         SCAN HEALTH PLAN         \$ 2           94         H5426         METCARE HEALTH PLANS I         \$ 2           95         H5435         PACIFICARE LIFE AND HEA         \$ 2           96         H5509         COVENTRY HEALTH AND LIF         \$ 2           97         H5520         HEALTH NET LIFE INSURAN         \$ 7           98         H5521         AETNA LIFE INSURANCE CO         \$ 2,0           99         H5522         HEALTH ASSURANCE PENNSY	
84         H4506         SELECTCARE OF TEXAS         \$ 1           85         H4514         EVERCARE OF TEXAS LLC         \$           86         H4523         AETNA HEALTH INC.         \$           87         H4527         PSO HEALTH SERVICES LL         \$           88         H4590         PACIFICARE OF TEXAS IN         \$ 3           89         H4875         PRIORITY HEALTH         \$ 4           90         H5211         SECURITY HEALTH PLAN OF         \$ 9           91         H5215         NETWORK HEALTH INSURANC         \$ 3           92         H5422         BLUE CROSS BLUE SHIELD         \$ 2           93         H5425         SCAN HEALTH PLAN         \$ 2           94         H5426         METCARE HEALTH PLANS I         \$ 2           95         H5435         PACIFICARE LIFE AND HEA         \$ 2           96         H5509         COVENTRY HEALTH AND LIF         \$ 2           97         H5520         HEALTH NET LIFE INSURAN         \$ 7           98         H5521         AETNA LIFE INSURANCE CO         \$ 2,0           99         H5522         HEALTH NET LIFE INSURANCE S         \$ 1           101         H5533         UPMC HEALTH NETWORK	30.00
85         H4514         EVERCARE OF TEXAS LLC         \$           86         H4523         AETNA HEALTH INC.         \$           87         H4527         PSO HEALTH SERVICES LL         \$           88         H4590         PACIFICARE OF TEXAS IN         \$           89         H4875         PRIORITY HEALTH         \$           90         H5211         SECURITY HEALTH PLAN OF         \$           91         H5215         NETWORK HEALTH PLAN OF         \$           92         H5422         BLUE CROSS BLUE SHIELD         \$           92         H5422         BLUE CROSS BLUE SHIELD         \$           94         H5426         METCARE HEALTH PLANS I         \$           95         H5435         PACIFICARE LIFE AND HEA         \$           96         H5509         COVENTRY HEALTH AND LIF         \$           97         H5520         HEALTH NET LIFE INSURAN         \$           98         H5521         AETNA LIFE INSURANCE CO         \$           99         H5522         HEALTH ASSURANCE PENNSY         \$           101         H5532         UNITED HEALTH INCORPORAT         \$           102         H5533         UPMC HEALTH NETWORK         \$	72.94
86         H4523         AETNA HEALTH INC.         \$           87         H4527         PSO HEALTH SERVICES LL         \$           88         H4590         PACIFICARE OF TEXAS IN         \$           89         H4875         PRIORITY HEALTH         \$           90         H5211         SECURITY HEALTH PLAN OF         \$           91         H5215         NETWORK HEALTH INSURANC         \$           92         H5422         BLUE CROSS BLUE SHIELD         \$           92         H5422         BLUE CROSS BLUE SHIELD         \$           93         H5425         SCAN HEALTH PLAN         \$           94         H5426         METCARE HEALTH PLANS I         \$           95         H5435         PACIFICARE LIFE AND HEA         \$           96         H5509         COVENTRY HEALTH AND LIF         \$           97         H5520         HEALTH NET LIFE INSURAN         \$           98         H5521         AETNA LIFE INSURANCE CO         \$           99         H5522         HEALTH ASSURANCE PENNSY         \$           101         H5533         UNITED HEALTH CARE INSUR         \$           102         H5533         UPMC HEALTH NETWORK         \$ <td>09.00</td>	09.00
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88         H4590         PACIFICARE OF TEXAS IN         \$ 3           89         H4875         PRIORITY HEALTH         \$ 4           90         H5211         SECURITY HEALTH PLAN OF         \$ 9           91         H5215         NETWORK HEALTH INSURANC         \$ 3           92         H5422         BLUE CROSS BLUE SHIELD         \$ 2           93         H5425         SCAN HEALTH PLAN         \$ 2           94         H5426         METCARE HEALTH PLANS I         \$ 2           95         H5435         PACIFICARE LIFE AND HEA         \$ 2           96         H5509         COVENTRY HEALTH AND LIF         \$ 2           97         H5520         HEALTH NET LIFE INSURAN         \$ 7           98         H5521         AETNA LIFE INSURANCE CO         \$ 2,0           99         H5522         HEALTH ASSURANCE PENNSY         \$ 4           100         H5528         GROUP HEALTH INCORPORAT         \$ 2           101         H5533         UPMC HEALTH NETWORK         \$ 1           103         H5774         AMERICAN HEALTH INC.         \$ 3           104         H6328         CARE N' CARE INSURANCE         \$ 1           105         H6360         KAISER FOUNDATI	97.21
89         H4875         PRIORITY HEALTH         \$ 4           90         H5211         SECURITY HEALTH PLAN OF         \$ 9           91         H5215         NETWORK HEALTH INSURANC         \$ 3           92         H5422         BLUE CROSS BLUE SHIELD         \$ 2           93         H5425         SCAN HEALTH PLAN         \$ 2           94         H5426         METCARE HEALTH PLANS I         \$ 2           95         H5435         PACIFICARE LIFE AND HEA         \$ 2           96         H5509         COVENTRY HEALTH AND LIF         \$ 2           97         H5520         HEALTH NET LIFE INSURAN         \$ 7           98         H5521         AETNA LIFE INSURANCE CO         \$ 2,0           99         H5522         HEALTH ASSURANCE PENNSY         \$ 4           100         H5528         GROUP HEALTH INCORPORAT         \$ 2           101         H5532         UNITED HEALTH CARE INSUR         \$ 1           102         H5533         UPMC HEALTH NETWORK         \$ 1           103         H5774         AMERICAN HEALTH INC.         \$ 3           104         H6328         CARE N' CARE INSURANCE         \$ 1           105         H6360         KAISER FOUND	5.58
90         H5211         SECURITY HEALTH PLAN OF         \$ 9           91         H5215         NETWORK HEALTH INSURANC         \$ 3           92         H5422         BLUE CROSS BLUE SHIELD         \$ 2           93         H5425         SCAN HEALTH PLAN         \$ 2           94         H5426         METCARE HEALTH PLANS I         \$ 2           95         H5435         PACIFICARE LIFE AND HEA         \$ 2           96         H5509         COVENTRY HEALTH AND LIF         \$ 2           97         H5520         HEALTH NET LIFE INSURAN         \$ 7           98         H5521         AETNA LIFE INSURANCE CO         \$ 2,0           99         H5522         HEALTH ASSURANCE PENNSY         \$ 4           100         H5528         GROUP HEALTH INCORPORAT         \$ 2           101         H5532         UNITED HEALTH CARE INSUR         \$ 1           102         H5533         UPMC HEALTH NETWORK         \$ 1           103         H5774         AMERICAN HEALTH INC.         \$ 3           104         H6328         CARE N' CARE INSURANCE         \$ 1           105         H6360         KAISER FOUNDATION HP OF         \$ 1           106         H6609         HUM	83.81
91         H5215         NETWORK HEALTH INSURANC         \$         3           92         H5422         BLUE CROSS BLUE SHIELD         \$         2           93         H5425         SCAN HEALTH PLAN         \$         2           94         H5426         METCARE HEALTH PLANS I         \$           95         H5435         PACIFICARE LIFE AND HEA         \$           96         H5509         COVENTRY HEALTH AND LIF         \$           97         H5520         HEALTH NET LIFE INSURAN         \$           98         H5521         AETNA LIFE INSURANCE CO         \$         2,0           99         H5522         HEALTH ASSURANCE PENNSY         \$         4           100         H5528         GROUP HEALTH INCORPORAT         \$         2           101         H5532         UNITED HEALTH CARE INSUR         \$           102         H5533         UPMC HEALTH NETWORK         \$         1           103         H5774         AMERICAN HEALTH INC.         \$         3           104         H6328         CARE N' CARE INSURANCE         \$         1           105         H6360         KAISER FOUNDATION HP OF         \$         1           106	27.74
92       H5422       BLUE CROSS BLUE SHIELD       \$ 2         93       H5425       SCAN HEALTH PLAN       \$ 2         94       H5426       METCARE HEALTH PLANS I       \$         95       H5435       PACIFICARE LIFE AND HEA       \$         96       H5509       COVENTRY HEALTH AND LIF       \$ 2         97       H5520       HEALTH NET LIFE INSURAN       \$ 7         98       H5521       AETNA LIFE INSURANCE CO       \$ 2,0         99       H5522       HEALTH ASSURANCE PENNSY       \$ 4         100       H5528       GROUP HEALTH INCORPORAT       \$ 2         101       H5532       UNITED HEALTH CARE INSUR       \$         102       H5533       UPMC HEALTH NETWORK       \$ 1         103       H5774       AMERICAN HEALTH INC.       \$ 3         104       H6328       CARE N' CARE INSURANCE       \$ 1         105       H6360       KAISER FOUNDATION HP OF       \$ 1         106       H6609       HUMANA INSURANCE COMPAN       \$ 2,4         107       H7220       CLARIAN HEALTH PLANS, I       \$ 2         108       H7917       BLUE CROSS BLUE SHIELD       \$ 1         109       H8145       HUMANA INSURA	83.87
93       H5425       SCAN HEALTH PLAN       \$         94       H5426       METCARE HEALTH PLANS I       \$         95       H5435       PACIFICARE LIFE AND HEA       \$         96       H5509       COVENTRY HEALTH AND LIF       \$         97       H5520       HEALTH NET LIFE INSURAN       \$         98       H5521       AETNA LIFE INSURANCE CO       \$       2,0         99       H5522       HEALTH ASSURANCE PENNSY       \$       4         100       H5528       GROUP HEALTH INCORPORAT       \$       2         101       H5532       UNITED HEALTHCARE INSUR       \$         102       H5533       UPMC HEALTH NETWORK       \$       1         103       H5774       AMERICAN HEALTH INC.       \$       3         104       H6328       CARE N' CARE INSURANCE       \$       1         105       H6360       KAISER FOUNDATION HP OF       \$       1         106       H6609       HUMANA INSURANCE COMPAN       \$       2,4         107       H7220       CLARIAN HEALTH PLANS, I       \$       2         108       H7917       BLUE CROSS BLUE SHIELD       \$       1         109       H8145<	96.86
94         H5426         METCARE HEALTH PLANS I         \$           95         H5435         PACIFICARE LIFE AND HEA         \$           96         H5509         COVENTRY HEALTH AND LIF         \$           97         H5520         HEALTH NET LIFE INSURAN         \$           98         H5521         AETNA LIFE INSURANCE CO         \$           99         H5522         HEALTH ASSURANCE PENNSY         \$           100         H5528         GROUP HEALTH INCORPORAT         \$           101         H5532         UNITED HEALTH CARE INSUR         \$           102         H5533         UPMC HEALTH NETWORK         \$         1           103         H5774         AMERICAN HEALTH INC.         \$         3           104         H6328         CARE N' CARE INSURANCE         \$         1           105         H6360         KAISER FOUNDATION HP OF         \$         1           106         H6609         HUMANA INSURANCE COMPAN         \$         2,4           107         H7220         CLARIAN HEALTH PLANS, I         \$         2           108         H7917         BLUE CROSS BLUE SHIELD         \$         1           109         H8145         HUMANA INSURAN	33.65
95         H5435         PACIFICARE LIFE AND HEA         \$           96         H5509         COVENTRY HEALTH AND LIF         \$           97         H5520         HEALTH NET LIFE INSURAN         \$           98         H5521         AETNA LIFE INSURANCE CO         \$           99         H5522         HEALTH ASSURANCE PENNSY         \$           100         H5528         GROUP HEALTH INCORPORAT         \$           101         H5532         UNITED HEALTH CARE INSUR         \$           102         H5533         UPMC HEALTH NETWORK         \$         1           103         H5774         AMERICAN HEALTH INC.         \$         3           104         H6328         CARE N' CARE INSURANCE         \$         1           105         H6360         KAISER FOUNDATION HP OF         \$         1           106         H6609         HUMANA INSURANCE COMPAN         \$         2,4           107         H7220         CLARIAN HEALTH PLANS, I         \$         2           108         H7917         BLUE CROSS BLUE SHIELD         \$         1           109         H8145         HUMANA INSURANCE COMPAN         \$         2           110         H8393	14.62
96         H5509         COVENTRY HEALTH AND LIF         \$ 2           97         H5520         HEALTH NET LIFE INSURAN         \$ 7           98         H5521         AETNA LIFE INSURANCE CO         \$ 2,0           99         H5522         HEALTH ASSURANCE PENNSY         \$ 4           100         H5528         GROUP HEALTH INCORPORAT         \$ 2           101         H5532         UNITED HEALTH CARE INSUR         \$ 1           102         H5533         UPMC HEALTH NETWORK         \$ 1           103         H5774         AMERICAN HEALTH INC.         \$ 3           104         H6328         CARE N' CARE INSURANCE         \$ 1           105         H6360         KAISER FOUNDATION HP OF         \$ 1           106         H6609         HUMANA INSURANCE COMPAN         \$ 2,4           107         H7220         CLARIAN HEALTH PLANS, I         \$ 2           108         H7917         BLUE CROSS BLUE SHIELD         \$ 1           109         H8145         HUMANA INSURANCE COMPAN         \$ 2           110         H8393         COVENTRY HEALTH AND LIF         \$ 6	3.65
97       H5520       HEALTH NET LIFE INSURAN       \$ 7         98       H5521       AETNA LIFE INSURANCE CO       \$ 2,0         99       H5522       HEALTH ASSURANCE PENNSY       \$ 4         100       H5528       GROUP HEALTH INCORPORAT       \$ 2         101       H5532       UNITED HEALTH CARE INSUR       \$ 1         102       H5533       UPMC HEALTH NETWORK       \$ 1         103       H5774       AMERICAN HEALTH INC.       \$ 3         104       H6328       CARE N' CARE INSURANCE       \$ 1         105       H6360       KAISER FOUNDATION HP OF       \$ 1         106       H6609       HUMANA INSURANCE COMPAN       \$ 2,4         107       H7220       CLARIAN HEALTH PLANS, I       \$ 2         108       H7917       BLUE CROSS BLUE SHIELD       \$ 1         109       H8145       HUMANA INSURANCE COMPAN       \$ 2         110       H8393       COVENTRY HEALTH AND LIF       \$ 6	96.19
98         H5521         AETNA LIFE INSURANCE CO         \$ 2,0           99         H5522         HEALTH ASSURANCE PENNSY         \$ 4           100         H5528         GROUP HEALTH INCORPORAT         \$ 2           101         H5532         UNITED HEALTHCARE INSUR         \$ 1           102         H5533         UPMC HEALTH NETWORK         \$ 1           103         H5774         AMERICAN HEALTH INC.         \$ 3           104         H6328         CARE N' CARE INSURANCE         \$ 1           105         H6360         KAISER FOUNDATION HP OF         \$ 1           106         H6609         HUMANA INSURANCE COMPAN         \$ 2,4           107         H7220         CLARIAN HEALTH PLANS, I         \$ 2           108         H7917         BLUE CROSS BLUE SHIELD         \$ 1           109         H8145         HUMANA INSURANCE COMPAN         \$ 2           110         H8393         COVENTRY HEALTH AND LIF         \$ 6	62.79
99         H5522         HEALTH ASSURANCE PENNSY         \$         4           100         H5528         GROUP HEALTH INCORPORAT         \$         2           101         H5532         UNITED HEALTH CARE INSUR         \$           102         H5533         UPMC HEALTH NETWORK         \$         1           103         H5774         AMERICAN HEALTH INC.         \$         3           104         H6328         CARE N' CARE INSURANCE         \$         1           105         H6360         KAISER FOUNDATION HP OF         \$         1           106         H6609         HUMANA INSURANCE COMPAN         \$         2,4           107         H7220         CLARIAN HEALTH PLANS, I         \$         2           108         H7917         BLUE CROSS BLUE SHIELD         \$         1           109         H8145         HUMANA INSURANCE COMPAN         \$         2           110         H8393         COVENTRY HEALTH AND LIF         \$         6	29.99
100         H5528         GROUP HEALTH INCORPORAT         \$         2           101         H5532         UNITED HEALTHCARE INSUR         \$           102         H5533         UPMC HEALTH NETWORK         \$         1           103         H5774         AMERICAN HEALTH INC.         \$         3           104         H6328         CARE N' CARE INSURANCE         \$         1           105         H6360         KAISER FOUNDATION HP OF         \$         1           106         H6609         HUMANA INSURANCE COMPAN         \$         2,4           107         H7220         CLARIAN HEALTH PLANS, I         \$         2           108         H7917         BLUE CROSS BLUE SHIELD         \$         1           109         H8145         HUMANA INSURANCE COMPAN         \$         2           110         H8393         COVENTRY HEALTH AND LIF         \$         6	68.50
101       H5532       UNITED HEALTH CARE INSUR       \$         102       H5533       UPMC HEALTH NETWORK       \$       1         103       H5774       AMERICAN HEALTH INC.       \$       3         104       H6328       CARE N' CARE INSURANCE       \$       1         105       H6360       KAISER FOUNDATION HP OF       \$       1         106       H6609       HUMANA INSURANCE COMPAN       \$       2,4         107       H7220       CLARIAN HEALTH PLANS, I       \$       2         108       H7917       BLUE CROSS BLUE SHIELD       \$       1         109       H8145       HUMANA INSURANCE COMPAN       \$       2         110       H8393       COVENTRY HEALTH AND LIF       \$       6	51.04
102       H5533       UPMC HEALTH NETWORK       \$ 1         103       H5774       AMERICAN HEALTH INC.       \$ 3         104       H6328       CARE N' CARE INSURANCE       \$ 1         105       H6360       KAISER FOUNDATION HP OF       \$ 1         106       H6609       HUMANA INSURANCE COMPAN       \$ 2,4         107       H7220       CLARIAN HEALTH PLANS, I       \$ 2         108       H7917       BLUE CROSS BLUE SHIELD       \$ 1         109       H8145       HUMANA INSURANCE COMPAN       \$ 2         110       H8393       COVENTRY HEALTH AND LIF       \$ 6	42.62
103       H5774       AMERICAN HEALTH INC.       \$ 3         104       H6328       CARE N' CARE INSURANCE       \$ 1         105       H6360       KAISER FOUNDATION HP OF       \$ 1         106       H6609       HUMANA INSURANCE COMPAN       \$ 2,4         107       H7220       CLARIAN HEALTH PLANS, I       \$ 2         108       H7917       BLUE CROSS BLUE SHIELD       \$ 1         109       H8145       HUMANA INSURANCE COMPAN       \$ 2         110       H8393       COVENTRY HEALTH AND LIF       \$ 6	93.72
104       H6328       CARE N' CARE INSURANCE       \$ 1         105       H6360       KAISER FOUNDATION HP OF       \$ 1         106       H6609       HUMANA INSURANCE COMPAN       \$ 2,4         107       H7220       CLARIAN HEALTH PLANS, I       \$ 2         108       H7917       BLUE CROSS BLUE SHIELD       \$ 1         109       H8145       HUMANA INSURANCE COMPAN       \$ 2         110       H8393       COVENTRY HEALTH AND LIF       \$ 6	29.20
105       H6360       KAISER FOUNDATION HP OF       \$ 1         106       H6609       HUMANA INSURANCE COMPAN       \$ 2,4         107       H7220       CLARIAN HEALTH PLANS, I       \$ 2         108       H7917       BLUE CROSS BLUE SHIELD       \$ 1         109       H8145       HUMANA INSURANCE COMPAN       \$ 2         110       H8393       COVENTRY HEALTH AND LIF       \$ 6	02.60
106         H6609         HUMANA INSURANCE COMPAN         \$ 2,4           107         H7220         CLARIAN HEALTH PLANS, I         \$ 2           108         H7917         BLUE CROSS BLUE SHIELD         \$ 1           109         H8145         HUMANA INSURANCE COMPAN         \$ 2           110         H8393         COVENTRY HEALTH AND LIF         \$ 6	16.40
107         H7220         CLARIAN HEALTH PLANS, I         \$         2           108         H7917         BLUE CROSS BLUE SHIELD         \$         1           109         H8145         HUMANA INSURANCE COMPAN         \$         2           110         H8393         COVENTRY HEALTH AND LIF         \$         6	71.88
108         H7917         BLUE CROSS BLUE SHIELD         \$ 1           109         H8145         HUMANA INSURANCE COMPAN         \$ 2           110         H8393         COVENTRY HEALTH AND LIF         \$ 6	01.08
109         H8145         HUMANA INSURANCE COMPAN         \$         2           110         H8393         COVENTRY HEALTH AND LIF         \$         6	50.98
110 H8393 COVENTRY HEALTH AND LIF \$ 6	29.32
	58.08
111 H8552 ANTHEM BLUE CROSS LIFE \$ 4	30.34
	31.55
112 H8980 COVENTRY HEALTH AND LIF \$	91.08
113 H9001 FALLON COMMUNITY HEALTH \$	67.50
114 H9003 KAISER FOUNDATION HP OF \$ 9	96.04
115 H9047 PROVIDENCE HEALTH PLAN \$	59.08
	98.03
	31.68
	07.99
	20.79

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120	R5342	UNITED HEALTHCARE INSUR	\$	216.45
121	R5826	HUMANA INSURANCE COMPAN	\$	1,867.74
122	R5941	ANTHEM INSURANCE COMPAN	\$	822.71
123	R7444	UNITED HEALTHCARE INSUR	\$	560.12
124	R9896	CARE IMPROVEMENT PLUS S	\$	91.08
125	S0064	UNITED PROSPERITY LIFE	\$	172.85
126	S0197	CAMBRIDGE LIFE INSURANC	\$	41.01
127	S0655	TUFTS INSURANCE COMPANY	\$	400.18
128	S1030	BCBS OF ALABAMA AND BCB	\$	3,957.37
129	S2321	QCC INS CO D/B/A AMERIH	\$	2,785.24
130	S2468	CA PHYSICIANS SERVICE	\$	720.03
131	S2893	BLUE CROSS BLUE SHIELD	\$	542.19
132	S3521	EXCELLUS HEALTH PLAN I	\$	1,152.22
133	S4219	HEALTH ALLIANCE MEDICAL	\$	91.29
134	S4802	STERLING LIFE INSURANCE	\$	2,085.19
135	S5540	BLUE CROSS AND BLUE SHI	\$	1,816.06
136	S5584	BLUE CROSS BLUE SHIELD	\$	286.63
137	S5593	HIGHMARK SENIOR RESOURC	\$	2,278.89
138	S5596	ANTHEM INSURANCE COMPAN	\$	5,766.93
139	S5601	SILVERSCRIPT INSURANCE	\$	41,099.77
140	S5609	ASURIS NORTHWEST HEALTH	\$	478.06
141	S5617	CONNECTICUT GENERAL LIF	\$	2,262.11
142	S5660	MEDCO HEALTH SOLUTIONS	\$ 1	119,174.69
143	S5670	COVENTRY HEALTH AND LIF	\$	252.00
144	S5674	FIRST HEALTH LIFE AND H	\$	701.42
145	S5715	HCSC INSURANCE SERVICES	\$	2,990.60
146	S5726	BLUE CROSS BLUE SHIELD	\$	2,055.51
147	S5743	BLUE CROSS BLUE SHIELD	\$	7,648.05
148	S5755	UNITED AMERICAN INSURAN	\$	394.05
149	S5766	FIRST CARE INC.	\$	520.60
150	S5768	FIRST HEALTH LIFE & HEA	\$	6,693.79
151	S5795	ARKANSAS BCBS A MUTUAL	\$	895.83
152	S5803	MEMBERHEALTH INC.	\$	108.29
153	S5805	UNITED HEALTHCARE INSUR	\$	13,171.44
154	S5810	AETNA LIFE INSURANCE CO	\$	2,847.86
155	S5820	UNITED HEALTHCARE INSUR	\$	32,597.82
156	S5884	HUMANA INSURANCE COMPAN	\$	5,538.42
157	S5904	BLUE CROSS AND BLUE SHI	\$	1,776.33
158	S5921	PACIFICARE LIFE AND HEA	\$	19,448.25
159	S5932	HEALTHSPRING INC. HEALT	\$	989.15
160	S5953	BLUE CROSS AND BLUE SHI	\$	98.79
161	S5966	GROUP HEALTH INCORPORAT	\$	3,017.93
162	S5967	WELLCARE PRESCRIPTION I	\$	167.37
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163	S5975	ODS HEALTH PLAN	\$	1,610.89
164	S5983	MEDCO HEALTH SOLUTIONS	\$	478.43
165	S6875	QCC INS CO D/B/A AMERIH	\$	75.00
166	S7694	ENVISION INSURANCE COMP	\$	613.48
167	S7950	EXPRESS SCRIPTS INSURAN	\$	30,485.52
168	S8067	AVALON HEALTH LTD	\$	484.60
169	S8841	NMHC GROUP SOLUTION INS	\$	0.44
170	S9579	STONEBRIDGE LIFE INSURA	\$	4,660.06
		Total	\$ 4	400,888.93