

CSSC is posting the file format for the new CGDP Tracking Report discussed during the Coverage Gap Discount Program (CGDP) Payment Overview on Feb 3. The Tracking Report is a cumulative year report that shows the status of each gap discount PDE saved in the CMS data base. There is one Tracking Report for each benefit year. Status codes report if a PDE was invoiced or pended. Pended status is assigned in the following hierarchy.

- blanks - Not Pended
- 01 - Retro LI
- 02 - Low Volume
- 03 - Data Quality Review
- 99 - Other

Blanks- Not Pended: The Status code for invoiced records is “Not Pended”; the “Invoiced Report ID” identifies the invoice quarter. On a record by record basis, Part D sponsors can reconcile the PDEs with a specific “Invoiced Report ID” to the Contract Data Report for that quarter.

01 - Retro LI: CMS does not invoice Gap Discount PDEs when a beneficiary receives Low Income Eligibility after the Gap Discount PDE was accepted. The beneficiary’s gap discount PDEs are pended.

Sponsor action: The sponsor shall re-adjudicate the claim and submit an adjusted PDE. On the adjusted record Reported Gap Discount will be zero. The updated patient liability fields (Patient Pay, LICs, Other TrOOP and PLRO) will include the new low income subsidy and low income co-pay amounts.

02 - Low Volume: Since PDEs in low volume groups (defined as groups with ten or fewer beneficiaries in the same pharmacy with the same NDC-9) must be invoiced in aggregate, CMS, at its discretion, temporarily delays invoicing Low Volume PDEs until the count exceeds 10. At that point the records that made up the low volume group are invoiced individually with full report detail.

Sponsor action: Sponsors take no action to change Low Volume pend status. The report simply explains why the record(s) was not invoiced.

03 - Data Quality Review: The PDE Data Quality Web Site is the most reliable source to for current status of records requiring Sponsor validation. When records are pended for retro-LI or low volume that may also require data quality review, the data Quality Review count may be understated.

Sponsor Action: For Gap Discount PDEs, complete Data Quality Review within 15 days.

99 – Other: To be defined.

The first Tracking Report will be available shortly following distribution of the quarterly Coverage Gap Discount Program (CGDP) reports. In this first version only, the Pend Status will be either ‘blanks’ (Not Pended), 02 (Low Volume) or ‘99’ (Other). Sponsors should check the PDE Data Quality Website to determine which of the pended PDEs require further action.

Beginning with the second quarter, the Sponsor Tracking Report will be distributed simultaneously with the quarterly reports and all pended PDEs will be assigned the correct Pend Code according to the hierarchy discussed above.