
HOT TOPICS & BEST PRACTICES

Suggested Claim Level Data Fields and Definitions

CMS is posting suggested Claim Level Data (CLD) fields that may be exchanged for claims validation purposes. Over the years, we have received feedback from states, manufacturers, and industry groups that have shared with CMS the CLD they have found useful in preventing or resolving disputes Medicaid Drug Rebate disputes (August 9, 2018).

Resources:

[Claim Level Data Fields and Definitions](#)

Threshold (Write-off) Reminders for Medicaid Drug Rebates

In program guidance issued on June 29, 2017, CMS reminds both manufacturers and states of the current thresholds regarding the differing types of drug rebate write-offs for cases in which states are unable to collect rebates from manufacturers.

Resources:

State Release #181: <https://www.medicaid.gov/medicaid-chip-program-information/by-topics/prescription-drugs/downloads/rx-releases/state-releases/state-rel-181.pdf>

Manufacturer Release #105: <http://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Prescription-Drugs/Downloads/Rx-Releases/MFR-Releases/mfr-rel-105.pdf>

Reminder: State Hearing Mechanism Option Available

In program guidance issued on June 29, 2017, CMS reminds states that they should make manufacturers aware of the process to request a hearing in that state. While most manufacturers and states prefer to engage in the dispute resolution process, the state hearing mechanism is available to both states and manufacturers as a viable option for resolving disputes.

Resources:

State Release #181: <http://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Prescription-Drugs/Downloads/Rx-Releases/State-Releases/state-rel-181.pdf>

Manufacturer Release #105: <http://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Prescription-Drugs/Downloads/Rx-Releases/MFR-Releases/mfr-rel-105.pdf>

Updates/Additions to Existing Adjustment/Dispute Codes Reported on the Reconciliation of State Invoice (ROSI) and the Prior Quarter Adjustment Statement (PQAS)

In program guidance issued on June 29, 2017, CMS addresses a few dispute scenarios that were not adequately represented within the current ROSI (form CMS-304) or the PQAS (form CMS-304a) adjustment/dispute codes, and provides further clarification and (where applicable) revisions in order to address these situations.

Resources:

State Release #181: <http://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Prescription-Drugs/Downloads/Rx-Releases/State-Releases/state-rel-181.pdf>

Manufacturer Release #105: <http://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Prescription-Drugs/Downloads/Rx-Releases/MFR-Releases/mfr-rel-105.pdf>

Nonresponsive Manufacturers and Delinquent Rebate Payments

In program guidance issued on June 29, 2017, CMS illustrates the difference between non-payment of rebate invoices and dispute resolution.

Resources:

State Release #181: <http://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Prescription-Drugs/Downloads/Rx-Releases/State-Releases/state-rel-181.pdf>

Manufacturer Release #105: <http://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Prescription-Drugs/Downloads/Rx-Releases/MFR-Releases/mfr-rel-105.pdf>

Non-Compliant State Drug Utilization Data (SDUD)

Many states are sending SDUD and quarterly rebate invoices with obvious errors that should be detected and corrected at the time of claim adjudication or provider invoice utilization review for physician-administered drug claims. CMS is reviewing SDUD for which minimal edits are not applied, and will work with states before taking any necessary compliance action. For states, data editing and correction before rebate billing and SDUD transmission is an important requirement and best practice.

The DRP Team shared program guidance on this topic on July 21, 2016.

Resources:

State Release #177: <https://www.medicaid.gov/medicaid-chip-program-information/by-topics/prescription-drugs/downloads/rx-releases/state-releases/state-rel-177.pdf>

Manufacturer Release #100: <https://www.medicaid.gov/medicaid-chip-program-information/by-topics/prescription-drugs/downloads/rx-releases/mfr-releases/mfr-rel-100.pdf>

Best Practices: Sharing & Requesting Claims-Level Data (CLD)

The DRP Team shared information on general best practices on labeler requests for, and state sharing, of CLD on December 31, 2015.

Resources:

State Release #173: <https://www.medicaid.gov/medicaid-chip-program-information/by-topics/prescription->

[drugs/downloads/rx-releases/state-releases/state-rel-173.pdf](https://www.medicare.gov/medicaid-chip-program-information/by-topics/prescription-drugs/downloads/rx-releases/state-releases/state-rel-173.pdf)

Manufacturer Release #95: <https://www.medicare.gov/medicaid-chip-program-information/by-topics/prescription-drugs/downloads/rx-releases/mfr-releases/mfr-rel-095.pdf>

Limitations on Disputing NDCs with Retroactively Reported Termination Dates

The DRP Team shared information about dispute limitations on retroactively reported termination dates on September 12, 2014.

Resources:

State Release #168: <https://www.medicare.gov/medicaid-chip-program-information/by-topics/prescription-drugs/downloads/rx-releases/state-releases/state-rel-168.pdf>

Manufacturer Release #91: <https://www.medicare.gov/medicaid-chip-program-information/by-topics/prescription-drugs/downloads/rx-releases/mfr-releases/mfr-rel-091.pdf>