MEDICAID DRUG REBATE LABELER INSTRUCTIONS for

RECONCILIATION OF STATE INVOICE (FORM CMS-304)

The Medicaid drug rebate Reconciliation of State Invoice (ROSI) is mandated for use by labelers to uniformly explain the adjusted rebate payments to states for the <u>current quarter</u>. The ROSI **MUST** accompany rebate payments made to states **if**:

- 1. The labeler is NOT paying the full rebate amount due for the current quarter, i.e., the labeler is disputing any units invoiced; or
- 2. The state invoice contains zeros (0s) in the RPU field due to the labeler's lack of data submittal, **AND** the labeler is remitting the full rebate amount due for the current quarter.

The ROSI is **not required**:

- 1. **If** the state invoice RPU field contains zeros (0s) but the CMS tape contains an RPU value, **AND** the labeler is remitting the full rebate amount due for the current quarter. Labelers MUST return a copy of the state's invoice with the rebate payment and may optionally pen/ink the RPU field on the invoice copy.
- 2. **If** the state invoice RPU field contains zeros (0s) due to CMS data edits, **AND** the labeler is remitting the full rebate amount due for the current quarter. Labelers MUST make pen/ink changes to the RPU on a copy of the state's invoice and return it with the full remittance.
- 3. **If** there are <u>no</u> zero (0) RPU amounts on the state's invoice, **AND** the labeler is remitting the full rebate amount due for the current quarter. Labelers MUST return a copy of the state's invoice with the rebate payment.

NOTE: Labelers may choose to complete and submit the ROSI each quarter regardless of the exceptions listed above.

30 days of receiving the state's current quarter invoice.

The labeler may complete and submit the ROSI in one of two media, paper or electronic, depending on the labeler's capabilities. Labelers may develop an automated system for the ROSI using the electronic field size listing attached as Appendix A. Labelers <u>must</u> submit the ROSI in the mandated format regardless of the media selected. No additional information should be entered on the form itself and no information should be omitted unless instructed in the data definitions.

The Labeler Data Definitions, Appendix B, fully explain the information required for each data element on the ROSI. Please refer to these definitions for a complete explanation of the column headings whether completing the ROSI via paper or when developing an electronic medium.

Appendix C, Adjustment and Dispute Codes, lists the codes labelers may enter to explain any adjustments and/or disputes. The codes are comprehensive and accommodate any adjustment or dispute. (This list serves both current and prior quarter reporting (See form CMS-304a).) Codes A-I are generally considered Adjustment Codes, and codes N-W are generally considered Dispute Codes. Only use codes listed in Appendix C.

Labelers may choose up to three codes each for adjustments and disputes per NDC. Attach supporting documentation, as needed, to further explain the reason for the adjustment or dispute. Labelers <u>must</u> supply documentation for codes that require it.

SPECIFIC INSTRUCTIONS

The ROSI is used for response to states' **CURRENT QUARTER UTILIZATION DATA ONLY**. (A separate form CMS-304a, the PQAS, has been developed for labelers to reconcile state utilization changes for prior quarters, prior disputed units, and PPAs.)

- 1. The ROSI is <u>quarter and invoice specific</u>. Therefore, only current quarter data is reported on this form.
- 2. Using the data definitions, enter the required information for **each** NDC reported on the state invoice. Each column is "lettered" for ease of reference.
- 3. Enter grand totals for columns E through H, and K through N. The grand total for column N for all NDCs listed, plus any interest being paid, should equal the remittance to the state.
 - However, **IF** a labeler completes and submits a PQAS simultaneously with the ROSI, the amount of the remittance should equal the Total Remittance as shown on the ROSI plus or minus the Total Remittance indicated on the PQAS.
- 4. Submit the ROSI with the rebate payment to the state.

Examples for Completing the ROSI

Appendix D to these instructions is a condensed ROSI sample showing column entries for four examples. The examples reflect situations such as adjusting the RPU, adjusting the invoiced units, and disputing units.

According to the Paperwork Reduction Act of 1995, no response is required for information collection unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0938-0676. The time required to complete this information collection is estimated to average 37 hours per response, including reviewing instructions, searching existing data sources, gathering the needed data, and completing and reviewing the information collection. If you have comments concerning the accuracy of the time estimate or suggestions for improving this form, please write to: CMS, 7500 Security Boulevard, Attn: PRA Reports Clearance Officer, Baltimore, Maryland 21244-1850.

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DATA ELEMENT NAME: Company Name DATA DEFINITION: Name of company as it appears on the signed rebate agreement. Alpha-numeric values, first 25 positions of SPECIFICATIONS: company name, left justified, blank filled. Labeler Code DATA ELEMENT NAME: First segment of National Drug Code that identifies the manufacturer, labeler, DATA DEFINITION: relabeler, packager, repackager or distributor of the drug. Numeric values only, 5 positions right justified, zero filled; no blanks. SPECIFICATIONS: DATA ELEMENT NAME: Quarter Covered DATA DEFINITION: This data element will always be the **current** quarter and year. SPECIFICATIONS: Numeric values, 5 position field, QYYYY; no blanks Valid values for Q: 1 = January 1 - March 31 2 = April 1 - June 30 3 = July 1 - September 30 4 = October 1 - December 31 Valid values for YYYY: Four digit calendar vear covered.

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DATA ELEMENT NAME: Labeler Contact Labeler's contact person for questions concerning this report. DATA DEFINITION: Alpha-numeric values, 20 positions, left justified, first name and last name separated by 1 blank. SPECIFICATIONS: DATA ELEMENT NAME: Phone Telephone number of labeler's contact person. DATA DEFINITION: Alpha-numeric values, 14 positions, area code, phone number, and extension, if needed. SPECIFICATIONS: DATA ELEMENT NAME: Fax DATA DEFINITION: Fax number of labeler's contact person. SPECIFICATIONS: Alpha-numeric values, 10 positions, area code and phone number. DATA ELEMENT NAME: State Code DATA DEFINITION: State postal abbreviation. Alpha values, 2 position field; no blanks. SPECIFICATIONS:

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DATA ELEMENT NAME: Invoice Number Invoice identification number. If invoice contains no identification number, this field DATA DEFINITION: is left blank. Alpha-numeric values, 10 position field, right justified, blank filled. SPECIFICATIONS: DATA ELEMENT NAME: Date DATA DEFINITION: Date this report was <u>created</u> (not mailed). Numeric values only, 8 position field; SPECIFICATIONS: no blanks. DATA ELEMENT NAME: Product/Package Code (Column A) DATA DEFINITION: Second and Third segments of National Drug Code. Alpha-numeric values, 6 position field, right justified, zero filled; <u>no blanks</u>. SPECIFICATIONS: DATA ELEMENT NAME: Product Name (Column B) First 10 positions of product name as it appears on the FDA listing form. DATA DEFINITION: Alpha-numeric values, 10 positions, left justified; blank filled. SPECIFICATIONS:

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DATA ELEMENT NAME: Rebate Per Unit (Column C) DATA DEFINITION: CMS-calculated rebate per unit as shown on the state invoice. Numeric values, 11 positions: 5 whole numbers and 6 decimals, right justified. Calculate to five decimals and round to **SPECIFICATIONS:** four; pad positions 5 & 6 with zeros. IF NOT AVAILABLE ON THE STATE INVOICE, this field will be zero filled; no blanks. DATA ELEMENT NAME: Adjusted Rebate Per Unit (Column D) Rebate per unit $\underline{\textbf{IF}}$ different than the amount entered in the Rebate Per Unit DATA DEFINITION: field. (The Adjustment Code field must be annotated.) Numeric values, 11 positions: 5 whole numbers and 6 decimals, right justified. Calculate to five decimals and round to SPECIFICATIONS: four, pad positions 5 & 6 with zeros; blank filled, if not applicable. DATA ELEMENT NAME: Units Invoiced (Column E) This element <u>will always be</u> the state-calculated number of units reimbursed as DATA DEFINITION: shown on the invoice. Please note that, upon completion of the ROSI, this element also acts as a compilation of the three elements which follow it (Adjusted Units, Labeler Disputed Units, and Units Paid). Numeric values, 12 positions: 9 whole SPECIFICATIONS: numbers and 3 decimals, right justified, zero filled; <u>no blanks</u>.

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if not applicable.

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DATA ELEMENT NAME: Labeler Disputed Units (Column G) The number of Invoiced Units being DATA DEFINITION: disputed, The number of the remaining units being disputed after an adjustment has been made. Numeric values, 12 positions: 9 whole numbers and 3 decimals, right justified, zero filled; no blanks. SPECIFICATIONS: DATA ELEMENT NAME: Units Paid (Column H) DATA DEFINITION: Labeler-calculated number of units paid. This is calculated as follows: Units Invoiced Adjusted Units Labeler Disputed Units + or -Numeric values, 12 positions: 9 whole numbers and 3 decimals, right justified, zero filled; <u>no blanks</u>. SPECIFICATIONS: DATA ELEMENT NAME: Adjustment Code(s) (Column I) Reason(s) labeler has adjusted the rebate per unit or the units invoiced. DATA DEFINITION: Alpha values only, 3 positions. SPECIFICATIONS: Valid values: Refer to Form CMS-304, Appendix C Maximum: 3 Adjustment Codes per NDC

PAGE 7 OF 11 Dispute Code(s) (Column J) DATA ELEMENT NAME: Reason(s) labeler is disputing any Units DATA DEFINITION: Invoicèd. Alpha values only, 3 positions. Valid values: Refer to Form **SPECIFICATIONS:** CMS-304, Appendix C Maximum: 3 Dispute Codes per NDC DATA ELEMENT NAME: Rebate Amount Invoiced (Column K) DATA DEFINITION: State-calculated rebate amount as shown on the invoice. Numeric values, 9 positions: 7 whole numbers and 2 decimals, right justified. If not available, this field will be zero filled; no blanks. SPECIFICATIONS: Please note that, upon completion of the ROSI, this element also acts as a compilation of the three elements which follow it (Invoice Correction Amount, Withheld Invoice Amount, and Rebate Amount Paid). DATA ELEMENT NAME: Invoice Correction Amount(+or-)(Column L) DATA DEFINITION: Labeler-corrected invoice amount (+ or -) based on any Adjusted Units and/or the Rebate Per Únit or the Adjusted Rebate Per Unit. Numeric values, preceded by a + or - sign, 10 positions: 7 whole numbers and 2 decimals, right justified. If not applicable, this field will be zero filled; no blanks, unless the ROSI is manually completed. SPECIFICATIONS:

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DATA ELEMENT NAME: Withheld Invoice Amount (Column M) Portion of Rebate Amount Invoiced being DATA DEFINITION: withheld, OR, The portion being withheld of the remaining Rebate Amount Invoiced after correction. Numeric values, 9 positions: 7 whole numbers and 2 decimals, right justified. If not applicable, this field will be zero filled; no blanks, unless the ROSI is manually completed. **SPECIFICATIONS:** Rebate Amount Paid (Column N) ATA ELEMENT NAME: DATA DEFINITION: Per NDC remittance for current quarter. This amount is calculated as follows: Rebate Amount Invoiced Invoice Correction Amount + or -Withheld Invoice Amount Numeric values, 9 positions: 7 whole numbers and 2 decimals, right justified; zero filled; no blanks. SPECIFICATIONS: Total Units Invoiced DATA ELEMENT NAME: Total number of units invoiced for all DATA DEFINITION: NDCs. Numeric values, 12 positions: 9 whole SPECIFICATIONS: numbers and 3 decimals, right justified, no blanks.

PAGE 9 OF 11 DATA ELEMENT NAME: Total Adjusted Units (+ or -) Total number of Adjusted Units for all NDCs DATA DEFINITION: (+ or -).Numeric values, preceded by a + or - sign, 13 positions, 9 whole numbers and 3 decimals, right justified, zero filled; **SPECIFICATIONS:** no blanks. DATA ELEMENT NAME: Total Labeler Disputed Units DATA DEFINITION: Total number of disputed units for all NDCs. Numeric values, 12 positions: 9 whole numbers and 3 decimals, right justified, zero filled; no blanks. SPECIFICATIONS: Total Units Paid DATA ELEMENT NAME: Total number of units paid for all NDCs. DATA DEFINITION: Numeric values, 12 positions: 9 whole numbers and 3 decimals, right justified, zero filled; no blanks. **SPECIFICATIONS:** Total Rebate Amount Invoiced DATA ELEMENT NAME: DATA DEFINITION: Total rebate amount invoiced by the state for all NDCs. SPECIFICATIONS: Numeric values, 10 positions: 8 whole numbers and 2 decimals, right justified, zero filled; no blanks.

DATA ELEMENT NAME: Total Invoice Correction Amount (+ or -) DATA DEFINITION: The total Invoice Correction Amount for all NDCs (+ or -). Numeric values, preceded by a + or - sign, 11 positions: 8 whole numbers and 2 decimals, right justified, zero filled; **SPECIFICATIONS:** no blanks. Total Withheld Invoice Amount DATA ELEMENT NAME: DATA DEFINITION: Total amount the labeler is withholding for all NDCs. Numeric values, 10 positions: 8 whole numbers and 2 decimals, right justified, zero filled; no blanks. SPECIFICATIONS: DATA ELEMENT NAME: Total Rebate Amount Paid DATA DEFINITION: Total rebate amount the labeler is remitting for all NDCs for current quarter. Numeric values, 10 positions: 8 whole numbers and 2 decimals, right justified, zero filled; no blanks. SPECIFICATIONS:

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PAGE 11 OF 11 DATA ELEMENT NAME: Plus Interest Payment DATA DEFINITION: Total amount of any <u>interest</u> the labeler is remitting. Numeric values, 8 positions: 6 whole numbers and 2 decimals, right justified, zero filled; SPECIFICATIONS: no blanks. TOTAL REMITTANCE DATA ELEMENT NAME: The Total Rebate Amount Paid for <u>all</u> NDCs plus any interest payment. DATA DEFINITION: Numeric values, 10 positions: 8 whole numbers and 2 decimals, right justified, zero filled; SPECIFICATIONS: no blanks.