

Reopening Timeline and Narrative

Reopening Timeline

	Reopening Step	Part D Advisors	GHP	Data Provider	CMS	Timeline
1	Documentation and Data Gathering	✓✓✓	✓	✓		1 - 2 Months
2	Review Data	✓✓✓				1 - 3 Months
3	Generate New Cost Report	✓✓✓				1 - 2 Weeks
4	Submit Appeal Request	✓✓				1 - 2 Weeks
5	Wait for Appeal Approval / Continue Data Review	✓✓✓			✓	1 - 2 Months
6	Complete the Reopening	✓✓✓				3 Months
7	Resubmit Final Reconciliation	✓✓✓	✓			1 - 2 Weeks
8	Submit Payment Justification	✓✓				1 - 2 Weeks
9	Wait for Payment	✓			✓	2 - 4 Weeks
	Total	✓✓✓	✓	✓	✓	6-12 Months

*All timeframes are estimates based on PDA's years of experience with the reopening application process. Steps that require an outside vendor's participation (1, 5 and 9) are projections based on typical experience, but cannot be controlled by PDA.

✓ Minimal Work (gather documents, phone calls, etc.)

✓✓ Medium Work (initial data review, information processing, conference calls, etc.)

✓✓✓ Heavy Work (claims processing, detailed review, reporting, supply RDS requirements, etc.)

Reopening Narrative

The deadline to reopen a reconciled RDS application is four years from the original determination date meaning deadlines are often fast approaching. To meet this challenge, PDA's team of Software Developers built *Task Manager*, a one of a kind tool that organizes the RDS reopening process into specific tasks with a set project schedule based on our ten years of RDS experience. This unique set-up gives our team the ability to process reopenings for all reconciled applications (for which data is available) at the same time. This greatly minimizes the Plan sponsor's risk of losing opportunities to reopen and brings in the most additional subsidy as quickly as possible.

The RDS reopening procedures in PDA's *Task Manager* have been summarized and outlined below. Potential time or resource commitments from the plan sponsor during the reopening process are noted in each section heading.

BEFORE THE REOPENING: IMPLEMENTATION MEETING

Another unique aspect of PDA's process is our client specific implementation guides. The implementation guide is a customized document that compiles all of the RDS application and health plan information needed for the reopening process as well as contact information for the involved parties in one place. The guide is created for each client during their implementation meeting where the client is introduced to their dedicated PDA Account Manager and Business Analyst.

STEP 1: DOCUMENTATION AND DATA GATHERING

To start the reopening process, PDA will work with the plan sponsor's IT department and their vendors to collect the necessary data. PDA will also assist the plan sponsor with collecting the historical application information from the RDS website. The plan sponsor can significantly reduce the amount of time required for this step by granting PDA short-term Account Manager status so that we can compile this information on the plan sponsor's behalf.

STEP 2: BEGIN DATA REVIEW

Once PDA has collected all the necessary data, we begin applying our unique drug filter, eligibility scanners and claims matching algorithms to the data, seeking out every last subsidy dollar the plan sponsor is entitled to.

STEP 3: GENERATE A NEW COST REPORT

Once PDA is confident that we've maximized the subsidy payment for the plan sponsor, our expert Business Analysts create a new cost report to submit alongside the Reopening Application.

STEP 4: SUBMIT THE REOPENING APPEAL

With all the data investigated and analyzed, plan sponsor's dedicated Account Manager will create a high and low estimate report for the plan sponsor. This report demonstrates the range of additional subsidy dollars the plan sponsor is likely to recoup should they choose to proceed with the reopening. The Account Manager will then contact the plan sponsor to discuss these estimates to get their approval before submitting the reopening appeal to the CMS.

STEP 5: WAIT FOR APPROVAL/CONTINUE DATA REVIEW

In PDA's experience it can be anywhere from 1-2 months before the CMS approves a reopening. During this time our Business Analysts and Account Managers continue their review of the plan sponsor's data, double and triple checking their work for additional subsidy dollars.

STEP 6: COMPLETE THE REOPENING

Once the appeal is approved, PDA then reprocesses the 12 step final reconciliation from the original filing. Assistance from the plan sponsor will only be necessary if questions arise during this process.

STEP 7: RESUBMIT THE FINAL RECONCILIATION

With the assistance of PDA's Account Managers, the plan sponsor's Authorized Representative will need to review our reopening findings and, once satisfied, submit the new final reconciliation with just a few clicks of their mouse on the RDS site. Then PDA waits for the CMS to review and respond to the new reconciliation, generally about 1-2 weeks.

STEP 8: SUBMIT PAYMENT JUSTIFICATION IF REQUIRED

For some reopening reconciliations the CMS requests additional information from PDA to justify the increase in the subsidy payment we're requesting. As the very first in the industry to market reopenings for value, PDA has developed an internal justification that provides the requested information the CMS as soon as possible to ensure plan sponsors receive their payments quickly.

STEP 9: WAIT FOR PAYMENT

Once the CMS approves the updated subsidy payment request, it's generally a few weeks before the subsidy payment is released to the plan sponsor via EFT from the CMS.

STEP 10: AUDIT SUPPORT

As an RDS final payment request is a request for Federal funds, it can be audited for up to six years. PDA partners with our clients for this entire period (whether additional subsidy is collected or not) and maintains all the necessary data in an audit ready format should it be needed.
