

Appendix C – CY 2024 Drug Pricing Validation Inventory

| Level | Validation Name | Long Description | Additional Guidance | Error Type |
|-------|---------------------------------|--|---|------------|
| 1 | Invalid File Format | Your upload file is not in a zip format. | Compressed .zip file Example: Z1234.zip | Fatal |
| 1 | File Size Larger than 150 MB | Your upload file is larger than the current size threshold. | Current threshold is configured at 150 MB. If your file size exceeds this number, contact the HPMS Help Desk. | Fatal |
| 1 | Invalid Contract Number | Your submission contains a contract number for which you do not have access in HPMS. | A user may only submit data for a contract number assigned to the user's account in HPMS. | Fatal |
| 1 | Ineligible for Resubmission | Your contract is not eligible for resubmission. | See the “CY 2024 Drug Pricing Submission Rules” section of the memo for details. | Fatal |
| | | | | |
| 2 | File is Unreadable | Your file cannot be read by HPMS. | | Fatal |
| 2 | Unexpected File/Directory Found | Your upload contains an unexpected file or directory. | Zip file may only contain: one PC file, one PF file, and if applicable, one CP file for the given contract number. | Fatal |
| 2 | Missing Data Files | Your upload did not include the required pharmacy cost, pricing, and if applicable, ceiling price files. | Zip file may only contain: one PC file, one PF file, and if applicable, one CP file for the given contract number. CMS contract number (e.g., Z1234 + abbreviated file name (i.e., PC, PF, or CP) in a text format (i.e., txt) Example: Z1234PF.txt | Fatal |
| 2 | Virus Detected | HPMS detected a virus in your upload. | | Fatal |
| 2 | Invalid Record Format | Your upload contains one or more records that do not adhere to the prescribed record format. | Each file must adhere to the file and field-level formats prescribed in the corresponding record layout. Any deviations will trigger this error. Some examples include: special characters in the plan or segment IDs; missing characters in the plan or segment IDs; spaces or blanks in the plan or segment IDs; missing vaccine administration fee; and invalid days supply values (i.e., values other than 30, 60, or 90). | Fatal |

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| 2 | Invalid Header Record | Your upload contains file(s) with an invalid header record. | | Fatal |
| 2 | Invalid Footer Record | Your upload contains file(s) with an invalid footer record. | | Fatal |
| 2 | Invalid Plan ID(s) | Your upload contains a pharmacy cost file with one or more invalid plans. | One or more of the plan IDs in your PC file(s) do not match a valid plan ID for the selected contract number in HPMS. | Fatal |
| 2 | Invalid Segment ID(s) | Your upload contains a pharmacy cost file with one or more invalid segments. | One or more of the segment IDs in your PC file(s) do not match a valid segment ID for the selected contract number/plan in HPMS. | Fatal |
| 2 | Missing PC Information | Your pharmacy cost file does not contain data for the plan(s) identified. | | Fatal |
| 2 | Record Count Mismatch | Your upload contains a record count that does not match the corresponding header. | | Fatal |
| | | | | |
| 2 | Non-Formulary Reference File (FRF) NDCs | Your pricing file contains one or more NDCs that are not present on the CMS FRF. Per the drug pricing submission guidelines, sponsors may only submit NDCs from their plan formulary that also appear on the CMS FRF. Failure to correct this issue will result in an MPF suppression. | CMS will revert to the CY 2023 version of this validation (as reflected here) prior to the CY 2024 test submission window 3. | Non-Attestable Suppressible |
| 2 | Exclusion of Standard Network Pharmacies (Retail) | Your pharmacy cost file does not contain standard network retail pharmacies, but your PBP indicates that you have both preferred and standard network retail pharmacies. Failure to correct this issue will result in an MPF suppression. | | Non-Attestable Suppressible |
| 2 | Inclusion of All Preferred Pharmacies (Mail) | Your pharmacy cost file contains only preferred mail pharmacies, but your PBP indicates that you only have standard network mail pharmacies. Failure to correct this issue will result in an MPF suppression. | | Non-Attestable Suppressible |

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| 2 | Inconsistent Preferred Flag | Your pharmacy cost file contains one or more pharmacies with inconsistent pharmacy type and preferred pharmacy status flags. Failure to correct this issue will result in an MPF suppression. | | Non-Attestable Suppressible |
| 2 | Inconsistent Duplicate Record | Your pharmacy cost file contains duplicate pricing records for one pharmacy in one plan. Failure to correct this issue will result in an MPF suppression. | | Non-Attestable Suppressible |
| 2 | Pharmacies Marked as Neither Retail nor Mail | Your pharmacy cost file contains records where pharmacies are marked as neither retail nor mail order for the plan(s) identified. Failure to correct this issue will result in an MPF suppression. | PHARMACY_RETAIL = 0 AND PHARMACY_MAIL = 0 | Non-Attestable Suppressible |
| 2 | PC and PF Mismatch | Your pharmacy cost file contains price IDs that have not been included in the corresponding pricing file. Failure to correct this issue will result in an MPF suppression. | | Non-Attestable Suppressible |
| 2 | PF/CP Mismatch (CP Submitted) | Your pricing and ceiling price files contain discrepancies. A ceiling price file was submitted, even though the pricing file did not indicate ceiling pricing. Failure to correct this issue will result in an MPF suppression. | | Non-Attestable Suppressible |
| 2 | No Preferred Pharmacies (Mail) | Your pharmacy cost file does not contain preferred mail pharmacies, but your PBP indicates that you have preferred mail pharmacies. Failure to correct this issue will result in an MPF suppression. | | Non-Attestable Suppressible |
| 2 | No Preferred Pharmacies (Retail) | Your pharmacy cost file does not contain preferred retail pharmacies, but your PBP indicates that you have preferred retail pharmacies. Failure to correct this issue will result in an MPF suppression. | | Non-Attestable Suppressible |
| 2 | Invalid Price IDs | The price ID does not exist in the corresponding pharmacy cost file. Failure to correct this issue will result in an MPF suppression. | | Non-Attestable Suppressible |

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| 2 | PF/PBP Discrepancy | Your pricing file does not contain pricing for benefits described in your organization's uploaded PBP. Your organization's uploaded PBP indicates that you offer benefits (i.e., days supply and pharmacy type) that are not reflected by at least one NDC in your most recent submission. Failure to correct this issue will result in an MPF suppression. | | Non-Attestable Suppressible |
| 2 | No Mail Order Pharmacies in the PC File | Your pharmacy cost file does not contain mail order pharmacies, but your PBP indicates that you have mail order pharmacies. Failure to correct this issue will result in an MPF suppression. | | Non-Attestable Suppressible |
| 2 | Inclusion of Some Preferred Pharmacies (Mail) | Your pharmacy cost file contains preferred mail pharmacies, but your PBP indicates that you only have standard network mail pharmacies. Failure to correct this issue will result in an MPF suppression. | | Non-Attestable Suppressible |
| 2 | Mail Order Pricing Data not Indicated in PBP | Your pharmacy cost file contains mail order pharmacies, but your PBP does not include mail order. Failure to correct this issue will result in an MPF suppression. | | Non-Attestable Suppressible |
| 2 | Inclusion of Preferred Pharmacies (Retail) | Your pharmacy cost file contains preferred retail pharmacies, but your PBP indicates that you only have standard network retail pharmacies. Failure to correct this issue will result in an MPF suppression. | | Non-Attestable Suppressible |
| 2 | Pricing File with Duplicate NDC Records | Your pricing file contains duplicate NDC records with different unit costs. | | Non-Attestable Suppressible |
| 2 | PF Unit Cost Discrepancy | Your pricing file is missing pricing in one or more price file. | | Non-Attestable Suppressible |
| | | | | |
| 2 | Zero or Blank Vaccine Administration Fees | Your pharmacy cost file contains a vaccine administration fee outlier. The PC file's vaccine administration fee field is populated with a zero. This is a suppressible error. | VACCINE_ADMINISTRATION_FEE = 0 | Attestable Suppressible |

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| 2 | Vaccine Administration Fee Outlier | Your pharmacy cost file contains a different vaccine administration fee for a given pharmacy within a price ID. The vaccine administration fee must be the same for each pharmacy within a given price ID. This is a suppressible error. | | Attestable Suppressible |
| 2 | Potential Brand Priced at Generic | Your pricing file contains brand drugs that are priced at or below generic for one or more price IDs. This is a suppressible error. | | Attestable Suppressible |
| 2 | Ceiling Price - Below Dispensing Fees | Your ceiling price files includes ceiling costs that are below the maximum dispensing fee(s) for the respective pharmacies. This is a suppressible error. | | Attestable Suppressible |
| 2 | Ceiling Price - Below Floor Price | Your ceiling price files include ceiling costs that are below the floor prices for the respective pharmacies. This is a suppressible error. | | Attestable Suppressible |
| 2 | High Dispensing Fees | Your pharmacy cost file contains one or more pharmacies with a high brand and generic dispensing fee. This is a suppressible error. | At least 5 pharmacies with a dispensing fee of \$10 or higher, or at least 1 pharmacy with a dispensing fee of \$20 or higher. | Attestable Suppressible |
| 2 | High Proportion of Preferred Retail Pharmacies | Your pharmacy cost file is a high outlier for the proportion of preferred retail pharmacies submitted. This is a suppressible error. | If a plan's network has preferred retail pharmacies, the proportion of pharmacies that are preferred must be below CMS' high threshold and above CMS' low threshold. | Attestable Suppressible |
| 2 | Low Proportion of Preferred Retail Pharmacies | Your pharmacy cost file is a low outlier for the proportion of preferred retail pharmacies submitted. This is a suppressible error. | If a plan's network has preferred retail pharmacies, the proportion of pharmacies that are preferred must be below CMS' high threshold and above CMS' low threshold. | Attestable Suppressible |
| 2 | Floor Pricing/Dispensing Fee | Your pharmacy cost file contains a floor price outlier where the floor price is less than the dispensing fee. This is a suppressible error. | | Attestable Suppressible |
| 2 | Floor Price Amount | Your pharmacy cost file contains a floor price outlier where the floor price exceeds or is equal to CMS' floor price threshold amount. This is a suppressible error. | FLOOR_PRICE ≥ \$8 | Attestable Suppressible |

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| 2 | Change in PC Network Size - Retail | Your pharmacy cost file has had a change in the PC retail network size that exceeds or is equal to CMS' threshold amount. This is a suppressible error. | $\left \frac{P_2 - P_1}{P_1} \right \geq \text{Threshold}$ <p>Where: P2 is the total number of retail pharmacies in the current submission P1 is the total number of retail pharmacies in the prior submission</p> | Attestable Suppressible |
| 2 | Change in PC Network Size - Retail Preferred | Your pharmacy cost file has had a change in the PC retail preferred network size that exceeds or is equal to CMS' threshold amount. This is a suppressible error. | $\left \frac{P_2 - P_1}{P_1} \right \geq \text{Threshold}$ <p>Where: P2 is the total number of preferred retail pharmacies in the current submission P1 is the total number of preferred retail pharmacies in the prior submission</p> | Attestable Suppressible |
| 2 | Change in PC Network Size - In Area Retail Pharmacies (Last Submission) | Your pharmacy cost file has had a change in the PC in-area retail network size that exceeds or is equal to CMS' threshold amount. This is a suppressible error. | $ P_1 - P_2 \geq \text{Threshold}$ <p>Where: P2 is the total number of in-area retail pharmacies in the current submission P1 is the total number of in-area retail pharmacies in the prior submission</p> | Attestable Suppressible |
| 2 | Change in PC Network Size - In Area Retail Pharmacies (Previous Window) | Your pharmacy cost file has had a change in the PC in-area retail network size that exceeds or is equal to CMS' threshold amount. This is a suppressible error. | $ P_1 - P_2 \geq \text{Threshold}$ <p>Where: P2 is the total number of in-area retail pharmacies in the current submission P1 is the total number of in-area retail pharmacies in the prior submission</p> | Attestable Suppressible |
| 2 | Pharmacy Network Size All Retail (Last Submission Posting) | Your pharmacy cost file has had at least a 1% change in the PC all retail network compared to the last submission. This is a suppressible error. | | Attestable Suppressible |

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| 2 | Pharmacy Network Size Preferred Retail (Last Submission Posting) | Your pharmacy cost file has had at least a 1% change in the PC preferred retail network compared to the last submission. This is a suppressible error. | | Attestable Suppressible |
| 2 | Difference in Brand and Generic Dispensing Fees for a 30 Day Supply | Your pharmacy cost file has at least two retail pharmacies or mail order pharmacies with a \$3 difference in the brand and generic dispensing fees for a given 30 day supply. This is a suppressible error. | Beginning with 2023, this validation includes mail order pharmacies. | Attestable Suppressible |
| 2 | Difference in Brand and Generic Dispensing Fees for a 60 Day Supply | Your pharmacy cost file has at least two retail pharmacies or mail order pharmacies with a \$3 difference in the brand and generic dispensing fees for a given 60 day supply. This is a suppressible error. | Beginning with 2023, this validation includes mail order pharmacies. | Attestable Suppressible |
| 2 | Difference in Brand and Generic Dispensing Fees for a 90 Day Supply | Your pharmacy cost file has at least two retail pharmacies or mail order pharmacies with a \$3 difference in the brand and generic dispensing fees for a given 90 day supply. This is a suppressible error. | Beginning with 2023, this validation includes mail order pharmacies. | Attestable Suppressible |
| | | | | |
| 2 | NPIs Not Found in NCPDP | Your pharmacy cost file contains an NPI that cannot be found in the NCPDP data, exceeding or equal to CMS' threshold amount. | | Informational |
| 2 | Submitted Zero-Dollar Unit Cost | Your pricing file contains one or more NDCs with a \$0.00 unit cost. MPF will no longer use this value to trigger the display of default pricing. Instead, MPF will display these NDCs as having a \$0.00 unit cost. | UNIT_COST = 0 | Informational |
| 2 | PF/FF Mismatch | Your pricing file contains one or more price IDs that do not have prices for all drugs on your formulary. MPF will display default pricing for these formulary drugs. | | Informational |
| 2 | PF/EDF Mismatch | Your pricing file contains one or more price IDs that do not have prices for all drugs on your excluded drug file. MPF will display default pricing for these formulary drugs. | | Informational |

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| 2 | PF/CP Mismatch (Missing CP) | Your pricing file indicates that ceiling pricing is being used, but a ceiling price file was not submitted. | | Informational |
| 2 | Exclusion of Standard Network Pharmacies (Mail) | Your pharmacy cost file does not contain standard network mail pharmacies, but your PBP indicates that you have preferred and standard network mail pharmacies. | | Informational |
| 2 | Difference in Retail Pharmacy Brand and Generic Dispensing Fees | Your pharmacy cost file has one retail pharmacy with a \$3 difference in the brand and generic dispensing fees for a given days supply (30, 60, or 90). | | Informational |
| 2 | Difference in Mail Order Pharmacy Brand and Generic Dispensing Fees | Your pharmacy cost file has one mail order pharmacy with a \$3 difference in the brand and generic dispensing fees for a given days supply (30, 60, or 90). | | Informational |
| | | | | |
| 3 | High Unit Cost | Your pricing file contains one or more NDCs priced at 5 times greater than or equal to the highest default price and 5 times more than or equal to the median for one or more price IDs. This is a suppressible error. | $UNIT_COST \geq 5 * default_MAX$ and $(UNIT_COST / UNIT_COST_MEDIAN \geq 5)$ | Attestable Suppressible |
| 3 | Low Unit Cost | Your pricing file contains one or more NDC(s) priced at 10 times less than or equal to the lowest default price and 10 times less than or equal to the median for one or more price IDs. This is a suppressible error. | $UNIT_COST \leq 1/10 * default_MIN$ and $(UNIT_COST / UNIT_COST_MEDIAN \leq 1/10)$ | Attestable Suppressible |
| 3 | Ceiling Price - High Quantity | Your ceiling price file contains one or more NDC(s) with ceiling quantities at least 5 times higher than median. This is a suppressible error. | | Attestable Suppressible |
| 3 | Ceiling Price - Low Quantity | Your ceiling price file contains one or more NDC(s) with ceiling quantities at least 5 times lower than median. This is a suppressible error. | | Attestable Suppressible |

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Error Key:

| Error Type | Description |
|-----------------------------|--|
| Fatal (Level 1) | <ul style="list-style-type: none"> These errors are presented directly on the submission page in HPMS. They are not reflected in the module reports. If a submission receives one or more fatal errors during level 1 processing, the file will not be uploaded to HPMS. The plan must correct the fatal error(s) and resubmit the zip file to HPMS within the applicable submission window. If the last submission in week one has one or more fatal errors, the plan will not be permitted to resubmit in week two, and the contract will be suppressed in Medicare Plan Finder (MPF). |
| Fatal (Level 2) | <ul style="list-style-type: none"> The plan must correct the fatal error(s) and resubmit the zip file to HPMS within the applicable submission window. If the last submission in week one has one or more fatal errors, the plan will not be permitted to resubmit in week two, and the contract will be suppressed in MPF. If the last submission in week two has one or more fatal errors, the contract will be suppressed in MPF. |
| Non-Attestable Suppressible | <ul style="list-style-type: none"> The plan must correct the error(s) and resubmit the zip file to HPMS within the applicable submission window. If the data is not corrected and resubmitted within the applicable submission window, the contract will be suppressed in MPF. |
| Attestable Suppressible | <ul style="list-style-type: none"> The plan may correct the finding(s) and resubmit the zip file to HPMS within the applicable submission window. Alternatively, the plan may attest to the finding(s) in HPMS prior to the attestation deadline. If the data is not corrected and resubmitted within the applicable submission window, or if an attestation is not submitted for the finding(s) in HPMS, the contract will be suppressed in MPF. |
| Informational | <ul style="list-style-type: none"> If desired, the plan may correct the finding(s) and resubmit the zip file to HPMS within the applicable submission window. Otherwise, the data will display on MPF. |