DEPARTMENT OF HEALTH

Prescription Drug Price Transparency, Public Interest Reporting: Supplemental Frequently Asked Questions

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This Frequently Asked Questions (FAQ) document addresses questions related to the Prescription Drug Price Transparency (RxPT) Public Interest reporting. It supplements the existing Public Interest FAQ: Frequently Asked Questions for RxPT Reporting Entities: Public Interest Reporting—June 2024 (PDF). These FAQ documents aim to address practical approaches to submitting data and speaks to specific circumstances that pharmacies, PBMs, wholesalers, and manufacturers may face when reporting for Drugs of Substantial Public Interest.

For additional reporting resources, go to:

The RxPT Reporting Entities page for current reporting period dates and information, the most current Form & Manner guidance document, and other entity-specific information.

The Rx Data Reporting Portal Help page for specific instructions on registration and report submission.

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For reporting Drugs of Substantial Public Interest, what scope of an organization's business should be included in its reporting?

Manufacturers and **wholesalers** should submit data based on all their prescription drug business in the United States.

Pharmacy benefit managers should submit data based on all Minnesota business. *

Pharmacies should submit data on all prescriptions either dispensed in Minnesota or delivered to Minnesota addresses. *

*If distinguishing Minnesota transactions as described here is impossible, reporting entities should provide their best estimates and include their estimation methodology in the general comments field. If an estimate is impossible, reporting entities should describe what data is included in the general comments field. If a Minnesota-licensed entity does not conduct *any* business in Minnesota, then zeros should be entered in applicable data fields and reporting entities should describe this in the general comments field.

NEW: How should PBMs report units administered?

PBMs should treat the **standard unit of measure** (mL, g, each) of the drug product as the smallest dispensable unit. PBMs should report the number of milliliters, grams, or capsules/tablets/"each" of each drug product **administered** by your PBM.

- In the general comments section, indicate the following: "Pricing units administered have been evaluated as one unit = one standard unit of measure."
- Examples:
  - Simvastatin 20 mg tablet: report number of tablets administered
  - NovoLog FlexPen Prefilled Syringe 100 units/mL: report number of mL administered
  - Advair Diskus Fluticasone / Salmeterol 250 mcg: report number of grams administered

NEW: How should pharmacies report units acquired and units dispensed?

Pharmacies should report the number of **NDC units** (bottles, packages, pens–whatever the NDC which is being reported on encompasses) **acquired** by your pharmacy.

Pharmacies should treat the **standard unit of measure** (mL, g, each) of the drug product as the smallest dispensable unit. Pharmacies should report the number of milliliters, grams, or capsules/tablets/"each" of each drug product **dispensed** by your pharmacy.

- In the general comments section, indicate the following: “Pricing units dispensed have been evaluated as one unit = one standard unit of measure.”
- Examples:
  - Simvastatin 20mg tablet: report number of tablets dispensed
  - NovoLog FlexPen Prefilled Syringe 100 units/mL: report number of mL dispensed
  - Advair Diskus Fluticasone / Salmeterol 250 mcg: report number of grams dispensed

Is it possible to submit a consolidated report if a reporting entity—a Minnesota-licensed drug manufacturer, wholesaler, pharmacy benefit manager (PBM), or pharmacy—has multiple sites or if multiple organizations fall under a larger organizational umbrella?

There are options for consolidated reporting in some circumstances. If multiple entities are reporting under the same subdivision and have registered in the Portal as parent/child or affiliates, then they may submit a single report that aggregates data for multiple entities. Each entity that is obligated to report must still be identified in the organization registration and as contributing to the consolidated report.

Access the Registration Quick Start Guide (PDF) for tips on how best to register your organization to meet your reporting obligations.

We did not have any transactions for any drugs on the current list for this reporting period. How do I report zero?

Reporting entities may enter zeros for drugs they did not have any transactions for (produce, distribute, dispense, reimburse, etc.) for the reporting period. This means entering zeros in multiple data fields on the template. If you did not have any transactions for any of the drugs on the list, you may download the ‘Download Report Zeros’ template in the Portal, which is pre-populated with all relevant zeros. You must then upload that template and certify that you did not have any transactions for those drugs for the reporting period. Please note that future lists may include drugs that your organization does provide.

If you have transactions for only some, but not all, of the drugs on the current list, then you may also use the ‘Report Zeros’ template. Override the zeros for the lines with the drugs for which you do have transactions and leave the remaining lines zeros.

How do I request an extension to the deadline or an exemption from reporting?

Requests for exceptions—which include extensions and exemptions—are limited to small and independent pharmacies and must be re-applied for each reporting period. If you believe you qualify, request an exception via the Rx Data Portal by following the directions below. Include a

justification for your status as small or independent pharmacy and justification for your hardship request.

MDH will review and send notice of approval or denial via the Portal. All exception requests should be submitted at least 20 calendar days in advance of the reporting deadline to provide adequate time for review.

Directions: From the Menu dropdown in the upper right, select Public Interest Reporting. From there, click on the View button by the current reporting period. There, you should find an option to request an exception.

I am signed into the Portal but cannot find how to report. What do I do next?

The reporting template and reporting functionality are in the Rx Data Portal. From the Menu dropdown in the upper right, select Public Interest Reporting. From there, click on the View button by the current reporting period.

Also go to the Rx Data Reporting Portal Help page for specific instructions on registration and report submission.

I am getting error messages when I try to upload my spreadsheet. How do I fix this?

First consult the Pharmacy Public Interest Reporting Tutorial (youtube.com) linked from the Rx Data Reporting Portal Help, and then review the checklist and guidance below.

To complete a successful spreadsheet upload, ensure:

The file is in **.xlsx format**.

The file contains **no blank cells** in required fields.

The **file name** has not been altered from the template download.

The **column names** have not been altered from the template download.

The **tab names** have not been altered from the template download.

The data elements entered are in the proper **data format** (text, integer, etc.) as outlined in the "Help" tab in the template download. In particular, note the template requires the use 1 and 0 to denote "True" and "False" in the non-public and trade secret and NA fields. "NA" itself is not an accepted response.

Although you may see non-formatting related error messages, you may proceed in the upload process and correct or explain specific data element errors or discrepancies in subsequent steps in the Portal.

Can a reporting entity correct their data after it is uploaded and certified?

A reporting entity can correct data that was previously certified until MDH has completed its review of the item. A record with a status of Pending Publication can be edited by clicking Show Items in the Pending Publication section, clicking the pencil icon to edit the record, making changes in the Edit Item page, checking the certify checkbox at the bottom of the Edit Item page and clicking Save. Alternatively, if all items need to be edited, the entity can upload an updated template and recertify the items after the upload is complete.

References

1. Frequently Asked Questions for RxPT Reporting Entities: Public Interest Reporting—June 2024 (PDF) (https://www.health.state.mn.us/data/rxtransparency/docs/pifaqjune24.pdf)
2. RxPT Reporting Entities (https://www.health.state.mn.us/data/rxtransparency/rptgentities.html)
3. Rx Data Reporting Portal Help (https://www.health.state.mn.us/data/rxtransparency/help.html)
4. Registration Quick Start Guide (PDF) (https://www.health.state.mn.us/data/rxtransparency/docs/rxportalregquickstart.pdf)
5. Rx Data Portal (https://rxpt.health.mn.gov/)
6. Pharmacy Public Interest Reporting Tutorial (youtube.com) (https://www.youtube.com/watch?v=lKFBXvolOpQ)

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