

Maximizing Net Cost Recovery Through Analytics

Introduction to today's team



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Agenda



Drug revenue as
a percent of all
practice revenue



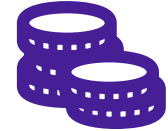
Average Sales
Price (ASP)



Payer
reimbursement
and Net Cost
Recovery (NCR)



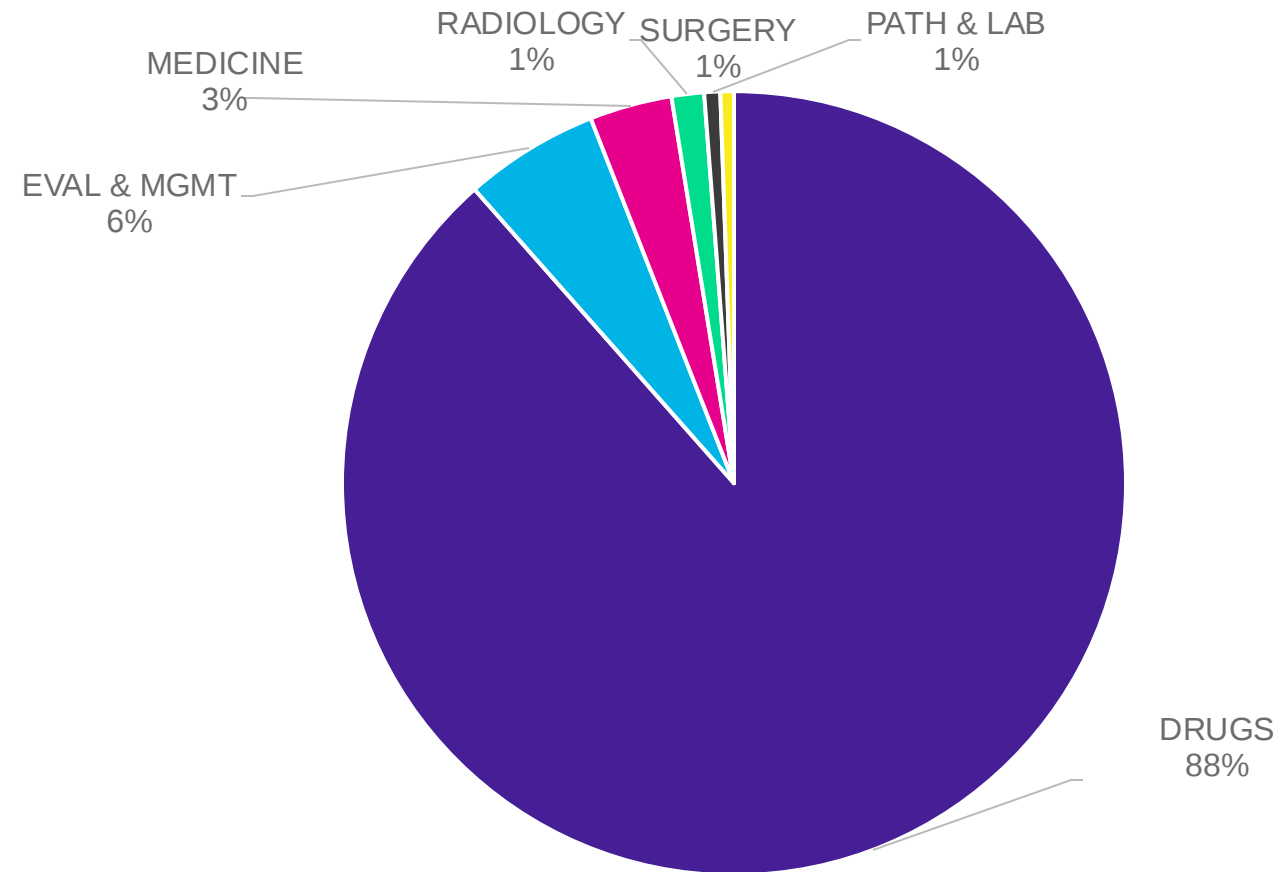
Review of
common areas
impacting NCR



Payer Key
Performance
Indicators (KPIs)
and fee
schedules

Drug revenue and Net Cost Recovery (NCR)

- Drugs represent at least 85% of revenue in most Hem/Onc practices
- Drug costs and reimbursement change quarterly
- Net Cost Recovery (NCR) is the difference between drug cost and the payments received.
- Careful monitoring of inventory, revenue cycle processes and payer reimbursement is critical to practice financial health



Drug reimbursement using Average Sales Price (ASP)

- Medicare uses Average Sales Price (ASP) to reimburse providers for most drugs and biologics
- ASP is a market-based price that includes all rebates and discounts negotiated between manufacturers and purchasers
- There is a two-quarter lag and during this time providers absorb any price increases for the drug
- When ASP is not available, Medicare pays:
 - New drugs without historical sales data - wholesale acquisition cost (WAC) plus 3% for the first two to three quarters the drug is on the market
 - Other drugs without ASP data may pay 106% of WAC, 95% of the average wholesale price (AWP), or an invoice price

Table 2: ASP Data Collection Dates Example

Sales Period	Close of the Sales Period Quarter	Close of the Manufacturer's Data Submission Window	Medicare Payment Effective Quarter
First Quarter of CY 2023	March 31, 2023	Sunday, April 30, 2023	Third Quarter of CY 2023
Second Quarter of CY 2023	June 30, 2023	Sunday, July 30, 2023	Fourth Quarter of CY 2023
Third Quarter of CY 2023	September 30, 2023	Monday, October 30, 2023	First Quarter of CY 2024
Fourth Quarter of CY 2023	December 31, 2023	Tuesday, January 30, 2024	Second Quarter of CY 2024

<https://www.cms.gov/files/document/frequently-asked-questions-faqs-asp-data-collection.pdf>

Trends in Average Sales Price (ASP)

- ASP pricing available on CMS website <https://www.cms.gov/medicare/payment/part-b-drugs/asp-pricing-files>
- Quarterly ASP files are usually released during the first week of the month prior to quarter change
- InfoDive® provides reports to monitor changes to ASP for drugs you use

Common Drug Name	CPT	Drug Category	Drug Status	Recent 12 Months								2024 Q4 - 2024 Q3 *		Current Month: 2024-09		
				Service Lines	Units	Medicare Allowable	2023 Q4	2024 Q1	2024 Q2	2024 Q3	2024 Q4	+/-	% +/-	Invoice Cost per Unit**	Units	Impact**
Keytruda (J9271)	J9271	TARGETED	Brand	1,891	424,203	\$23,969,567	\$56.41	\$55.73	\$57.31	\$56.66	\$58.22	\$1.56	2.7%	\$55.12	35,000	\$54,530
Opdivo (J9299)	J9299	TARGETED	Brand	1,089	346,818	\$10,769,127	\$30.43	\$31.09	\$31.09	\$31.60	\$31.75	\$0.15	0.5%	\$31.17	30,035	\$4,625
Darzalex Faspro (J9144)	J9144	DRUGS EXCLU...		1,086	195,121	\$9,656,864	\$49.31	\$49.05	\$48.80	\$51.00	\$51.41	\$0.41	0.8%	\$49.26	16,920	\$7,022
Enhertu (J9358)	J9358	DRUGS EXCLU...		766	194,243	\$5,276,964	\$26.31	\$27.31	\$27.27	\$27.75	\$27.81	\$0.06	0.2%	\$26.70	15,806	\$933
Somatuline Depot (J1930)	J1930	OTHER	Brand	774	92,490	\$4,572,741	\$51.16	\$48.44	\$48.00	\$50.02	\$49.97	\$-0.05	-0.1%	\$45.51	8,010	\$-433
Prolia, Xgeva (J0897)	J0897	OTHER	Brand	1,308	137,160	\$3,458,722	\$24.22	\$25.20	\$25.19	\$26.75	\$26.96	\$0.21	0.8%	\$26.05	9,900	\$2,089
Perjeta (J9306)	J9306	MONOCLONAL	Brand	440	194,462	\$3,015,662	\$15.42	\$15.43	\$15.42	\$15.95	\$16.12	\$0.17	1.1%	\$15.52	12,180	\$2,107
Tecentriq (J9022)	J9022	TARGETED	Brand	299	35,160	\$2,965,802	\$82.62	\$85.01	\$83.94	\$85.78	\$86.24	\$0.47	0.5%	\$83.05	3,048	\$1,417
Phesgo (J9316)	J9316	CHEMO		307	38,642	\$2,559,016	\$67.91	\$67.05	\$65.32	\$66.32	\$64.58	\$-1.74	-2.6%	\$65.07	4,920	\$-8,576
Adcetris (J9042)	J9042	TARGETED	Brand	106	10,100	\$2,320,282	\$222.11	\$230.61	\$230.74	\$239.60	\$239.86	\$0.25	0.1%	\$234.84	700	\$178
Yervoy (J9228)	J9228	TARGETED	Brand	181	13,300	\$2,302,361	\$168.56	\$172.42	\$172.71	\$176.78	\$176.88	\$0.10	0.1%	\$168.84	1,350	\$135
Udenyca (Q5111)	Q5111	SUPPORTIVE C...	Biosimilar	1,332	15,962	\$2,246,927	\$150.70	\$122.10	\$135.49	\$166.05	\$143.38	\$-22.67	-13.7%	\$163.33	804	\$-18,226
Reblozyl (J0896)	J0896	DRUGS EXCLU...		274	50,680	\$2,024,679	\$39.20	\$39.97	\$39.98	\$40.68	\$40.62	\$-0.06	-0.2%	\$39.14	4,100	\$-266
Imfinzi (J9173)	J9173	TARGETED	Brand	206	24,892	\$2,009,246	\$79.74	\$80.71	\$80.52	\$81.87	\$81.81	\$-0.06	-0.1%	\$79.26	2,298	\$-136
Polivy (J9309)	J9309	CHEMO	Brand	175	14,106	\$1,760,338	\$121.23	\$124.29	\$124.03	\$129.96	\$129.78	\$-0.18	-0.1%	\$124.56	1,120	\$-197
Sustol (J1627)	J1627	SUPPORTIVE C...	Brand	3,013	299,502	\$1,685,983	\$5.78	\$5.67	\$5.42	\$5.63	\$5.71	\$0.08	1.4%	\$7.71	22,001	\$1,672
Jemperli (J9272)	J9272	CHEMO		108	7,150	\$1,673,778	\$230.82	\$233.26	\$232.55	\$236.47	\$236.40	\$-0.06	0.0%	\$222.01	950	\$-60
Zirabev (Q5118)	Q5118	MISC SVCS TE...	Biosimilar	1,808	70,467	\$1,545,856	\$23.74	\$21.51	\$20.75	\$20.97	\$23.59	\$2.62	12.5%	\$20.43	4,436	\$11,605

*Red circles indicate a decrease of more than 5%. Green circles indicate an increase of more than 5%.

**Red circles indicate invoice cost greater than ASP. Impact is the current month units multiplied by the change in ASP in the most recent two quarters.

Payer fee schedules



Reimbursement can be based on various methods such as:

Proprietary fee schedules

% of Medicare

% of Medicare with variations based on type of drugs

Invoice pricing for select drugs

WAC

AWP

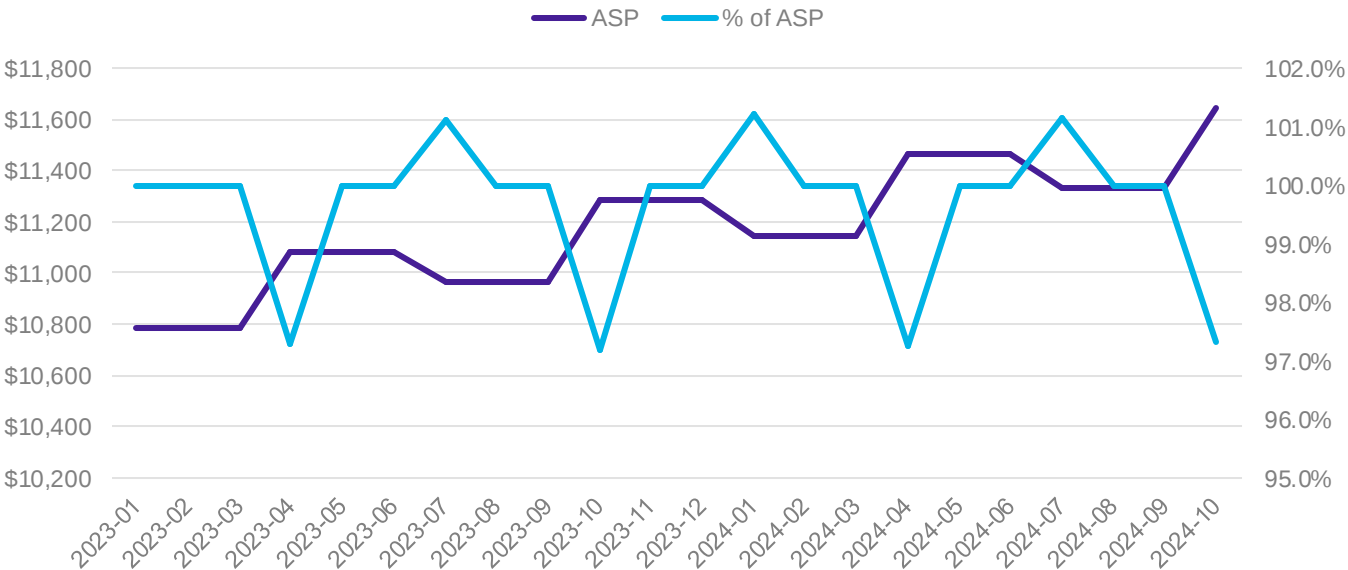


While Medicare updates at the quarter change, health plans can adjust payment rates at any point

Impact of delays in payer fee schedule updates

Keytruda (J9271)

Service Month	Per Unit		Per Administration (example using 200 units)				
	ASP	% Change	ASP	Cost	Payments	% of ASP	NCR
2023-01	\$53.91		\$10,782	\$10,243	\$10,782	100.0%	\$539
2023-02	\$53.91		\$10,782	\$10,243	\$10,782	100.0%	\$539
2023-03	\$53.91		\$10,782	\$10,243	\$10,782	100.0%	\$539
2023-04	\$55.42	2.8%	\$11,084	\$10,530	\$10,782	97.3%	\$252
2023-05	\$55.42		\$11,084	\$10,530	\$11,084	100.0%	\$554
2023-06	\$55.42		\$11,084	\$10,530	\$11,084	100.0%	\$554
2023-07	\$54.81	-1.1%	\$10,962	\$10,414	\$11,084	101.1%	\$670
2023-08	\$54.81		\$10,962	\$10,414	\$10,962	100.0%	\$548
2023-09	\$54.81		\$10,962	\$10,414	\$10,962	100.0%	\$548
2023-10	\$56.41	2.9%	\$11,282	\$10,718	\$10,962	97.2%	\$244
2023-11	\$56.41		\$11,282	\$10,718	\$11,282	100.0%	\$564
2023-12	\$56.41		\$11,282	\$10,718	\$11,282	100.0%	\$564
2024-01	\$55.73	-1.2%	\$11,146	\$10,589	\$11,282	101.2%	\$693
2024-02	\$55.73		\$11,146	\$10,589	\$11,146	100.0%	\$557
2024-03	\$55.73		\$11,146	\$10,589	\$11,146	100.0%	\$557
2024-04	\$57.31	2.8%	\$11,462	\$10,889	\$11,146	97.2%	\$257
2024-05	\$57.31		\$11,462	\$10,889	\$11,462	100.0%	\$573
2024-06	\$57.31		\$11,462	\$10,889	\$11,462	100.0%	\$573
2024-07	\$56.66	-1.1%	\$11,332	\$10,765	\$11,462	101.1%	\$697
2024-08	\$56.66		\$11,332	\$10,765	\$11,332	100.0%	\$567
2024-09	\$56.66		\$11,332	\$10,765	\$11,332	100.0%	\$567
2024-10	\$58.22	2.7%	\$11,643	\$11,061	\$11,332	97.3%	\$271



Example uses cost at 95% of ASP and payer rates at 100% of ASP with 1 month lag in fee schedule updates

Sequestration and impact on Net Cost Recovery (NCR)

- Sequestration is a mandatory reduction in Medicare Fee-for-Service (FFS) program payments.
- Sequestration was reinstated in stages in 2022, after being put on hold due to the COVID-19 pandemic:
 - May 1, 2020–March 31, 2022: No payment adjustment
 - April 1–June 30, 2022: 1% payment adjustment
 - July 1, 2022: 2% payment adjustment, returning to the pre-pandemic amount
- Medicare Advantage plans can take sequestration if outlined in contract

Sample Drug: Yervoy

		Formula	Value
A	ASP per Unit (4th Qtr 2024)	A	\$176.88
B	Cost per Unit	B	\$168.04
C	Rebate %	C	0.5%
D	Units Billed	D	100
E	ASP per Admin	A * D	\$17,688.40
F	Cost per Admin	B * D	\$16,803.98
G	Rebate per Admin	C * D	\$84.02
H	Cost less Rebate per Admin	F - G	\$16,719.96

		No Sequestration	With Sequestration
Medicare 80%	E * .80	\$14,150.72	\$14,150.72
Sequestration %	H	0%	2%
Sequestration Reduction	G - H	\$0.00	-\$283.01
Primary Payer Payment	G - I	\$14,150.72	\$13,867.71
Coinsurance/Patient (20%)	E * .20	\$3,537.68	\$3,537.68
Total Payment	J + K	\$17,688.40	\$17,405.39
Net Cost Recovery	L - F	\$884.42	\$601.41
Net Cost Recovery / Cost	M / F	5.3%	3.6%
Net Cost Recovery with Rebate	L - H	\$968.44	\$685.43
Net Cost Recovery with Rebate / Cost	O / F	5.8%	4.1%

Medicare patients w/o secondary

- If the 20% coinsurance is not collected, payment rate is 78.4% of Average Sales Price (ASP) for traditional Medicare patients
- Patients with no secondary and do not qualify for Medicaid can have a significant financial burden to cover their portion
- Avoid Net Cost Recovery (NCR) losses by enroll qualifying patients into patient assistance programs to help with meeting deductible and paying for patient responsibility

Sample Drug: Yervoy

	Value
ASP per Unit (4th Qtr 2024)	\$176.88
Cost per Unit	\$168.04
Rebate %	0.5%
Units Billed	100
ASP per Admin	\$17,688.40
Cost per Admin	\$16,803.98
Rebate per Admin	\$84.02
Cost less Rebate per Admin	\$16,719.96
Medicare 80%	\$14,150.72
Sequestration %	2%
Sequestration Reduction	-\$283.01
Primary Payer Payment	\$13,867.71
Coinsurance/Patient (20%)	\$0.00
Total Payment	\$13,867.71
Payment as % of ASP	78.4%
Net Cost Recovery	-\$2,936.27
Net Cost Recovery / Cost	-17.5%
Net Cost Recovery with Rebate	-\$2,852.25
Net Cost Recovery with Rebate / Cost	-17.0%

Missed waste billing

- Failing to bill for waste will cause losses in Net Cost Recovery (NCR)
- Monitoring for missed waste billing can improve NCR
- You can file waste on separate claim as long as within filing deadlines
- Common drugs with missed waste billing:
 - Yervoy
 - Jevtana
 - Ultomiris
 - Adcetris
 - Enherttu
 - Herceptin
 - Perjeta
 - Onivyde

Example impact of missed waste for Yervoy

	Waste Billed	Waste Not Billed
ASP per Unit (4th Qtr 2024)	\$176.88	\$176.88
Cost per Unit	\$168.04	\$168.04
Units Administered	85	85
Units Wasted	15	15
Units Wasted and Billed (JW)	15	0
Units Billed	100	85
ASP per Admin	\$17,688.40	\$17,688.40
Cost per Admin	\$16,803.98	\$16,803.98
Payment per Admin	\$17,688.40	\$15,035.14
NCR per Admin	\$884.42	-\$1,768.84

Drug claims paid below cost

Collect data and identify opportunity

COMMON DRUG NAME	PATIENT ID	SERVICE DATE	PAYER LIST	UNITS	CHARGES	PAYMENTS	ADJUSTMENTS	BALANCE	MC FEE TOTAL	% OF MC	COST	NET COST RECOVERY (NCR)
Kyprolis (J9047)	0006550922	2024-02-14	United Healthcare HMO AMGEN copay card (3127)	116	\$9,280.00	\$1,376.00	\$7,904.00	\$0.00	\$5,461.86	25.2%	\$5,374.28	-\$3,998.28

PATIENT ID	COMMON DRUG NAME	SERVICE DATE	UNITS	CHARGES	PAYMENTS	ADJUSTMENTS	BALANCE	MEDICARE FEE TOTAL	% OF MC FEE	COST	NET COST RECOVERY
0006550922	Kyprolis (J9047)	2024-03-27	116.0	\$9,280.00	\$6,384.64	\$2,895.36	\$0.00	\$5,461.86	116.9%	\$5,374.28	\$1,010.36
0006550922	Kyprolis (J9047)	2024-02-28	116.0	\$9,280.00	\$6,384.64	\$2,895.36	\$0.00	\$5,461.86	116.9%	\$5,374.28	\$1,010.36
0006550922	Kyprolis (J9047)	2024-02-14	116.0	\$9,280.00	\$1,376.00	\$7,904.00	\$0.00	\$5,461.86	25.2%	\$5,374.28	-\$3,998.28
0006550922	Kyprolis (J9047)	2024-01-31	116.0	\$9,280.00	\$6,384.64	\$2,895.36	\$0.00	\$5,461.86	116.9%	\$5,372.54	\$1,012.10

Investigate and follow-up

COMMON DRUG NAME	PATIENT ID	SERVICE DATE	PAYER LIST	UNITS	MEDICARE FEE TOTAL	% OF MC FEE	CHARGES	PAYMENTS	ADJUSTMENTS	COST	NET COST RECOVERY	NOTES
Kyprolis (J9047)	0006550922	2024-02-14	United Healthcare HMO AMGEN copay card (3127)	116	\$5,461.86	25.2%	\$9,280.00	\$1,376.00	\$7,904.00	\$5,374.28	-\$3,998.28	Practice paid \$1376 (25.2% of MC), claims on 1/31, 2/28 and 3/27 paid \$2895.36 (116.9% of MC), investigate/arv

Biosimilars

- Biosimilars entered the market in 2015
- Driven down the cost of the innovator
- Review innovator and the biosimilars together

Innovator	Common Drug Name	Unique Patients	Admins	Biosimilar Admins	% Biosimilar	Units	Units per Admin	Charges	Payments Closed ^	Charges per Admin	Payments per Admin ^	Invoice Cost per Admin	Cost w Rebate per Admin	Net Cost Recovery per Admin ^	Net Cost Recovery with Rebate per Admin ^	Net Cost Recovery per Unit ^	Net Cost Recovery with Rebate Per Unit ^	Net Cost Recovery ^	Net Cost Recovery with Rebate ^	Medicare Fee per Admin	% of Medicare Fee ^
Total		165	704	561	79.7%	8,437		\$4,954,063	\$973,041									\$95,500	\$163,172		
Neulasta	Fulphila (Q5108)	28	102	102	100.0%	1,224	12	\$750,312	\$135,783	\$7,356	\$1,579	\$1,640	\$1,413	\$-64	\$160	\$-5.30	\$13.33	\$-5,472	\$13,753	\$1,478	107.7%
Neulasta	Neulasta (J2506)	41	143			1,716	12	\$780,780	\$155,418	\$5,460	\$1,186	\$1,229	\$1,139	\$-9	\$77	\$-0.76	\$6.43	\$-1,188	\$10,102	\$954	123.2%
Neulasta	Nyvepria (Q5122)	40	153	153	100.0%	1,836	12	\$1,200,744	\$159,176	\$7,848	\$1,162	\$1,132	\$1,019	\$26	\$142	\$2.14	\$11.86	\$3,513	\$19,502	\$1,131	101.7%
Neulasta	Udenyca (Q5111)	70	306	306	100.0%	3,661	12	\$2,222,227	\$522,664	\$7,262	\$1,887	\$1,530	\$1,454	\$356	\$433	\$29.78	\$36.17	\$98,647	\$119,815	\$1,577	119.6%
Neulasta Total		165	704	561	79.7%	8,437		\$4,954,063	\$973,041									\$95,500	\$163,172		

Rebates and discounts

- Rebates and discounts reduce the cost of the drug
 - Distributor discounts
 - GPO rebates
 - Other manufacturer rebates
- InfoDive® applies GPO rebates
 - Rebates are spread evenly based on utilization for the time period the rebate was earned.
- For some drugs, the Net Cost Recovery (NCR) is negative until the rebates are applied
- Evaluating the impact of rebates on NCR can be tricky when there is a large 'buy-in' as the rebate would be earned in a time period before product is used and billed

Comparison: Net Cost Recovery (NCR) with rebates

Current Start 2024-01 Current End 2024-03 Previous Start 2023-01 Previous End 2023-03

Charge Status: Exc Zero Paid
Payment Status: Closed

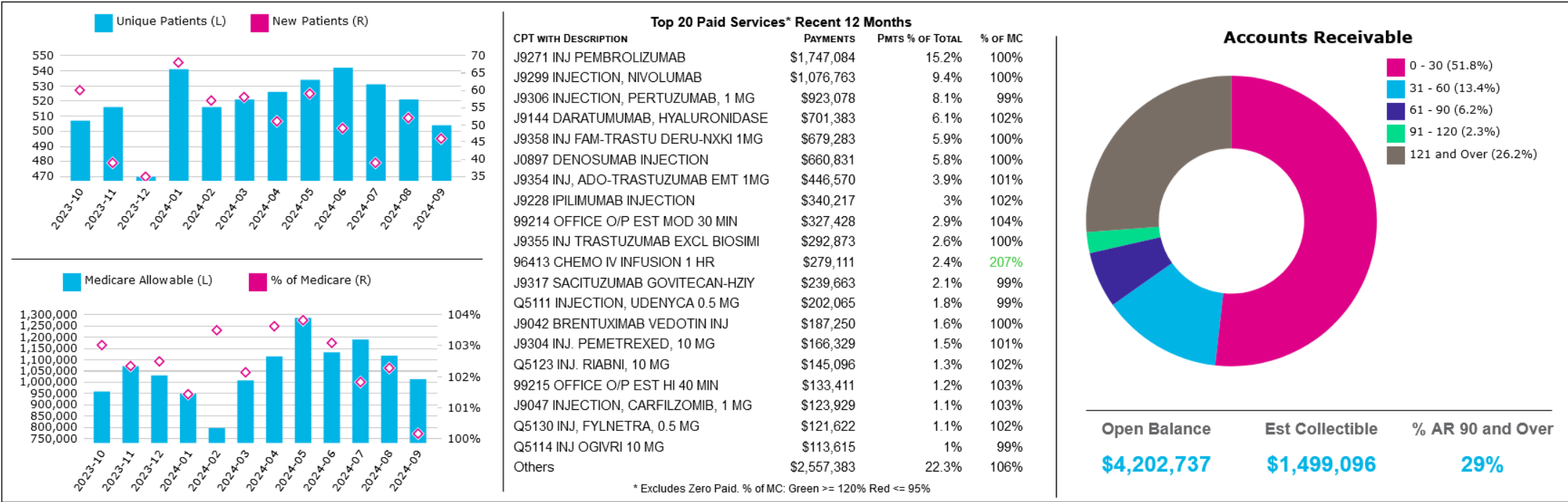
Common Drug Name	Cost				Payments				Medicare Fee Total				Net Cost Recovery				Net Cost Recovery with Rebate			
	Current	Previous	+/-	% +/-	Current	Previous	+/-	% +/-	Current	Previous	+/-	% +/-	Current	Previous	+/-	% +/-	Current	Previous	+/-	% +/-
Total	26,267,462.21	25,615,897.75	651,564.46	2.5%	28,472,990.89	27,015,948.23	1,457,042.66	5.4%	26,733,406.22	25,930,022.77	803,383.46	3.1%	2,205,528.68	1,400,050.48	805,478.20	57.5%	2,653,975.74	1,956,467.88	697,507.86	35.7%
Keytruda (J9271)	5,166,231.40	4,920,126.40	246,105.00	5.0%	5,584,080.97	5,295,369.66	288,711.31	5.5%	5,338,934.00	5,132,612.80	206,321.20	4.0%	417,849.57	375,243.26	42,606.31	11.4%	417,849.57	375,243.26	42,606.31	11.4%
Opdivo (J9299)	2,374,512.00	2,592,814.02	-218,302.02	-8.4%	2,492,211.93	2,712,153.21	-219,941.28	-8.1%	2,415,615.30	2,647,888.26	-232,272.96	-8.8%	117,699.93	119,339.19	-1,639.26	-1.4%	117,699.93	119,339.19	-1,639.26	-1.4%
Darzalex Faspro (J9144)	2,084,121.90	1,905,593.04	178,528.86	9.4%	2,236,141.51	1,957,254.86	278,886.65	14.2%	2,163,149.10	1,970,668.44	192,480.66	9.8%	152,019.61	51,661.82	100,357.79	194.3%	152,019.61	51,661.82	100,357.79	194.3%
Enhertu (J9358)	1,361,374.24	905,702.86	455,671.38	50.3%	1,510,914.13	954,087.13	556,827.00	58.4%	1,427,766.80	937,714.74	490,052.06	52.3%	149,539.89	48,384.27	101,155.62	209.1%	160,048.85	67,486.43	92,562.42	137.2%
Somatuline Depot (J1930)	962,227.14	1,133,168.70	-170,941.56	-15.1%	1,111,410.67	1,281,787.33	-170,376.66	-13.3%	1,065,261.57	1,248,436.80	-183,175.23	-14.7%	149,183.53	148,618.63	564.90	0.4%	149,183.53	148,618.63	564.90	0.4%
Prolia, Xgeva (J0897)	845,006.94	908,593.68	-63,586.74	-7.0%	875,129.95	943,440.73	-68,310.78	-7.2%	869,331.00	934,213.50	-64,882.50	-6.9%	30,123.01	34,847.05	-4,724.04	-13.6%	30,123.01	34,847.05	-4,724.04	-13.6%
Perjeta (J9306)	680,211.84	783,253.80	-103,041.96	-13.2%	743,773.08	862,241.86	-118,468.78	-13.7%	693,289.38	816,933.60	-123,644.22	-15.1%	63,561.24	78,988.06	-15,426.82	-19.5%	63,561.24	78,988.06	-15,426.82	-19.5%
Phesgo (J9316)	580,250.16	16,264.32	563,985.84	3,467.6%	668,075.91	30,280.34	637,795.57	2,106.3%	591,389.82	16,574.64	574,815.18	3,468.0%	87,825.75	14,016.02	73,809.73	526.6%	87,825.75	14,016.02	73,809.73	526.6%
Tecentriq (J9022)	555,105.38	557,784.00	-2,678.62	-0.5%	569,129.72	580,216.43	-11,086.71	-1.9%	573,314.18	581,752.80	-8,438.62	-1.5%	14,024.34	22,432.43	-8,408.09	-37.5%	14,024.34	22,432.43	-8,408.09	-37.5%
Yervoy (J9228)	537,972.50	509,129.60	28,842.90	5.7%	558,345.04	499,641.25	58,703.79	11.7%	560,361.75	530,460.80	29,900.95	5.6%	20,372.54	-9,488.35	29,860.89	314.7%	20,372.54	-9,488.35	29,860.89	314.7%

1Q2024: Practice paid 106.51% of MC

Payer Key Performance Indicators (KPIs)

Patient volume, payment rates and timeliness of payments

KPI dashboard for BCBS



Data extracted on Oct 01, 2024

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Monitoring non-contractual adjustments/write-offs

- Review drugs charge adjustments on claims paid below cost
- Contractual adjustments should be applied to reduce balance to fee schedule amount
- Non-contractual adjustments should be descriptive to allow analyses and address root causes of avoidable write-offs
- Be careful with allowing auto-posted adjustments! Even contractual adjustments need should be monitored

Patient ID	Service Date	Drug	Post Date	Transaction Type	Charge	Payment	Adjustment
					\$62,800	\$0	\$62,800
1	2024-08-20	Keytruda (J9271)	2024-08-22	Charge	\$62,800		
1	2024-08-20	Keytruda (J9271)	2024-09-13	Contractual Adjustment			\$62,800

Patient ID	Service Date	Drug	Post Date	Transaction Type	Charge	Payment	Adjustment
					\$62,800	\$0	\$62,800
2	2024-09-03	Keytruda (J9271)	2024-09-04	Charge	\$62,800		
2	2024-09-03	Keytruda (J9271)	2024-10-12	Contractual Adjustment			\$47,350
2	2024-09-03	Keytruda (J9271)	2024-10-12	No Authorization			\$15,450

Payer contract terms and rates

- Do you know where your contracts are?
- Do you have the current fee schedule rates?

Health Plan	Product Type	Agreement Effective Date	Amendments	Timely Filing	Timely Payment	Appeal Timeline	Termination no cause	Payment Rates							
								E&M	Medicine	Surgery	Drugs	Carve out Drugs	Lab	Path	Imaging
Aetna	Commercial														
	Marketplace														
	Medicaid														
	Medicare Advantage														
BlueCross BlueShield	Commercial														
	Marketplace														
	Medicaid														
	Medicare Advantage														
CIGNA	Commercial														
	Marketplace														
	Medicaid														
	Medicare Advantage														

Questions?

