

QUARTERLY REPORT TO PHARMACY CHOICE COMMISSION
Oklahoma Insurance Department - PBM COMPLIANCE DIVISION
COMPLAINTS & RESOLUTIONS

# Alleged Violations	Date Complaints Received	Closed Per:	# Closed Allegations	Refunds Issued to Pharmacies	\$ Amount of Refunds Issued to Pharmacies	\$ Amount of Additional Reimbursement to Pharmacy	Allegations Pending Resolution	# of Referrals to Legal	# of Alleged Violations Referred to Administrative Action	Violation Type Referred to Legal for Administrative Action	# Orders Entered	Settled / Agreed Resolved	Applications for License received by OID	Fines Levied	Fine Totals	Legal Cases with HEARINGS Pending	Legal Cases Closed
	2019 through 3rd Qtr 2020								1	n/a PCIMA v. Mull alleged						1	
25960	4th Qtr 2020 & 1st Qtr 2021						15221	9			1						9
		No Violation/ No Evidence Allegation Withdrawn	4789 2235						1	Doing Insurance Business without a License							
									1	Network Access							
									3	Consumer Mandated PBM Specialty Pharmacy							
		Refund / Agreed Resolution	3715	3715 \$	5,621.76					Consumer Mail or Preferred Network Opt Out Denied At PBM							
		Increased Reimbursement to Pharmacy / Agreed Resolution							5	PBM-Consumer Share Differential, PBM-Denial Referred to Advisory Committee							
		Pharmacy Allowed to Reverse & Rebill Claim / Agreed Resolution							5	1 Conflict							
14	2nd Qtr 2021						1	10		Doing Insurance Business without a License			1				
		No Violation/ No Evidence	13						8	126 IMAC Pricing	9					6	2
91,337	3rd Qtr 2021						80171	6		Transaction Fees			3				
		No Violation/ No Evidence Allegation Withdrawn	13 7938						7700	Violations							
									239	MAC Pricing Violations							
		Refund / Agreed Resolution	1961	1961 \$	2,274.74				2672	Transaction Fees							
		Increased Reimbursement to Pharmacy / Agreed Resolution								Doing Insurance Business without a License	7						
		Pharmacy Allowed to Reverse & Rebill Claim / Agreed Resolution															
		PSAO reimbursed \$ to pharmacy after PBM withdrew \$ from Pharmacy banking acct for \$25 Network Access fees owed by PSAO for ALL of PSAO's network pharmacies															
117311			21918	6990 \$	1254 \$	31,350.00	95393	26	10761		16		5			7	11

COMPLAINTS RECEIVED 3rd QUARTER - 2021 (July 1, 2021 - September 30, 2021)													
Complaint Type	Total # of Complaints that include this violation type (by SBS/OID #)	Total Alleged Violations within Complaints	Resolved by Hearing	Resolved by Settlement	Closed: No Violation; Lack of Evidence; or Lack of Complainant Cooperation	Closed: Allegation Withdrawn	Closed: Refund Issued / Agreed Resolution	\$ Amount of Refund	Closed: Pharmacy Allowed to Reverse & Rebill / Agreed Resolution	Closed: Increased Reimbursement to Pharmacy / Agreed Resolution	\$ Amount of Additional Reimbursement to Pharmacy	Closed: Other	Pending Resolution
Transaction Fees	54	60,060				7730	1961	\$ 2,274.74					50,369
MAC Pricing	113	30,004				208							29,796
Network/GeoAccess Complaints (Initiated Outside OID)													
Choice Restriction - Referred to PBM Owned	17	17			12								5
Network Enrollment/Participation Charge													
Copay & Diff Mail vs Retail													
Not Able to Contract with PBM	2	2			1								1
P&T Formulary													
Partial Referral List													
Contract Restrictions Against Consumers													
PBM-Retro Claim Adjustment													
Retail Paid Less Than PBM Owned													
Other: PBM withdrew \$ from pharmacy banking account	1	1254					1254	\$ 31,350.00					
COMPLAINT TOTALS	187	91,337			13	7938	3215	\$ 33,624.74					80,171

GeoAccess Inquiry (OID initiated)	Investigation Closed (PBM in Compliance)	GeoAccess Report Review/Approval Pending	Referred to Legal for Administrative Action	Order Entered	Settled / Agreed Resolved	Fines Levied	Fine Totals	Legal Cases Closed
41		41						

Operating Without a License Investigation (OID initiated)	Closed (PBM in Compliance or Not Applicable)	License Investigation Pending Final Resolution	Referred to Legal for Cease & Desist Order	Cease & Desist Orders Entered	Other Orders Entered	Fines Levied	Fine Amounts Total	Applications for License in Process	New PBM or TPA License Issued	Legal Cases Closed	Legal Cases Pending Final Resolution
0	0	0	0	0	7			3		0	0