

**2022 - 4th QUARTERLY REPORT TO PHARMACY CHOICE COMMISSION**  
*January 2023*  
**Oklahoma Insurance Department - PBM COMPLIANCE & ENFORCEMENT DIVISION**  
**COMPLAINTS & RESOLUTIONS**

Allegations of Violation			Closed: No Violation	Closed: Settlement Agreement between OID & PBM										Closed: Agreement/Resolution between Complainant & PBM					Licensing		Administrative Action & Enforcement					Pending Resolution		
Date Complaints Received	# Alleged violations	Violations Identified by OID	Lack of Evidence or Complainant Cooperation	Complaint Allegations Resolved	Violations Identified by OID Resolved	TOTAL # of NEGOTIATED Refunds & Increased Reimbursements to Pharmacies*	TOTAL NEGOTIATED \$ Amount TO BE Refunded / Reimbursed*	*Portion of NEGOTIATED Refunds / Reimbursements subject to Court decision	*Portion of \$ Amount NEGOTIATED Subject to Court Decision	Portion of NEGOTIATED Refunds / Reimbursements AUTHORIZED to be DISBURSED per Court decision	Portion of NEGOTIATED \$ Amount AUTHORIZED to be Refunded / Reimbursed per Court decision	TOTAL # of Refunds & Increased Reimbursements to Pharmacies to be DISBURSED (AFTER COURT DECISION)	TOTAL \$ Amount to be DISBURSED to Pharmacies (AFTER COURT DECISION)	# of Refunds to be issued from PBM to pharmacies	\$ Amount of Refunds	PBM Increased Reimbursement to Pharmacies	\$ Amount of Additional Reimbursements to Pharmacies	Closed: Allegation Withdrawn / Agreed Resolution Other	Application for New License submitted by PBM	New License Issued	Resolved by Hearing	Resolved by Consent Agreement	# of Fines / Penalties Imposed*	*Portion of Fines / Penalties subject to Court Decision	TOTAL \$ Amount of NEGOTIATED / ORDERED Fines/Penalties to be IMPOSED*	*Portion of \$ Amount of NEGOTIATED Fines / Penalties Subject to Court Decision	Complaint Allegations	OID Identified Violations
4th Qtr 2020 & 1st	25,959	149,534	10,611	5,173	149,534	154,707	\$ 1,385,009.04	(27,569)	\$ (1,157,549.00)	19,396	\$ 192,128.87	146,534	\$ 419,588.91	4,660	\$ 5,984.02	32	\$ 1,318.68	2,461	-	-	-	-	32,941	(25,200)	\$ 2,756,529.36	\$ (2,500,000.00)	3,022	-
2nd Qtr 2021	14	9,623	15	-	9,613	9,613	\$ 480,661.65	(9,613)	\$ (480,661.65)	8,055	\$ 79,799.81	8,055	\$ 79,799.81	-	\$ -	-	\$ -	2	7	7	-	4	27	\$ 2,700.00	-	-	2	
3rd Qtr 2021	91,331	1,768	21,265	18,339	1,768	20,107	\$ 576,826.73	(11,854)	\$ (511,775.86)	8,210	\$ 81,330.08	16,463	\$ 146,380.95	7,322	\$ 36,170.36	1,019	\$ 181,380.71	8,164	-	-	-	-	-	\$ -	-	35,222	-	
4th Qtr 2021	36,085	-	6,426	7,326	-	7,326	\$ 183,652.18	(5,238)	\$ (167,036.49)	2,108	\$ 20,876.76	4,196	\$ 37,492.45	-	\$ -	-	\$ -	15	-	-	-	-	-	\$ -	-	22,318	-	
1st Qtr 2022	23,587	-	2,539	-	-	-	\$ -	-	-	-	\$ -	-	\$ -	-	\$ -	-	\$ -	60	-	-	-	-	-	\$ -	-	20,988	-	
2nd Qtr 2022	13,852	-	2,312	-	-	-	\$ -	-	-	-	\$ -	-	\$ -	-	\$ -	911	\$ 41,100.03	-	-	-	-	-	-	\$ -	-	10,629	-	
3rd Qtr 2022	8,764	-	11	-	-	-	\$ -	-	\$ -	-	\$ -	-	\$ -	-	\$ -	-	\$ -	-	-	-	-	-	-	\$ -	\$ -	8,753	-	
4th Qtr 2022	6,100	-	-	-	-	-	\$ -	-	-	-	\$ -	-	\$ -	-	\$ -	-	\$ -	-	-	-	-	-	-	\$ -	-	6,100	-	
<b>TOTALS:</b>	<b>205,692</b>	<b>160,925</b>	<b>43,168</b>	<b>30,838</b>	<b>160,915</b>	<b>191,753</b>	<b>\$ 2,626,149.60</b>	<b>(54,274)</b>	<b>\$ (2,317,023.00)</b>	<b>37,769</b>	<b>\$ 374,129.52</b>	<b>175,248</b>	<b>\$ 683,256.12</b>	<b>11,982</b>	<b>\$ 42,154.38</b>	<b>1,962</b>	<b>\$ 223,799.42</b>	<b>10,702</b>	<b>7</b>	<b>7</b>	<b>-</b>	<b>4</b>	<b>32,968</b>	<b>(25,200)</b>	<b>\$ 2,759,229.36</b>	<b>\$ (2,500,000.00)</b>	<b>107,032</b>	<b>2</b>

SUMMARY						
# of Refunds & Increased Reimbursements to be disbursed to Pharmacies	\$ Amounts of Refunds & Increased Reimbursements to be Disbursed to Pharmacies	# of Fines/Penalties Imposed*	\$ Amount of Fines/Penalties Imposed*	# Resolved Alleged Violations from Complaints Received	# Resolved Alleged Violations Identified by OID	
<b>TOTALS:</b>	<b>189,192</b>	<b>\$ 949,209.92</b>	<b>32,968</b>	<b>\$ 2,759,229.36</b>	<b>98,660</b>	<b>160,923</b>

\* ALLOCATION & DISTRIBUTION OF SOME PORTIONS OF COLLECTED FUNDS ARE SUBJECT TO COURT RULINGS

CVS Caremark Settlement Agreement (Entered January 2022) Transaction Fee Refunds - Amount & Allocation Summary	OID Facilitated Refunds & Reimbursements to Oklahoma Pharmacies - Through FY 2022
Amount paid by CVS Caremark to be held temporarily in escrow - Allocation & Distribution subject to ruling by US District Court	Caremark ERISA plan related TF's to be DISTRIBUTED to Oklahoma pharmacies
\$ 2,317,023.00	\$ 374,129.52
USDC ruling: Med D preempts OK's prohibition of Transaction Fees. \$ Amount to be refunded to Caremark b/c related to Med D claims	Other Refunds / Reimbursements to pharmacies per 4 other Settlement Agreements & other resolutions facilitated by OID
\$ (1,942,893.48)	\$ 575,080.40
USDC ruling: ERISA does NOT preempt OK's prohibition of Transaction Fees. \$ Amount to be refunded to Oklahoma pharmacies b/c related to ERISA plan claims	Total Refunds/Reimbursements to pharmacies per Settlement Agreements & other resolutions facilitated by OID
\$ 374,129.52	\$ 949,209.92

<b>PBMs in Oklahoma (55)</b>
FAIROSRX, LLC
MAXCARE LLC
MAXORPLUS LTD
OP PHARMACY LLC
PHARMACY DATA MANAGEMENT INC
A & A DRUG CO DBA SAV-RX PRESCRIPTION SERVICES
DST PHARMACY SOLUTIONS, INC.
ELIXIR RX SOLUTIONS, LLC, dba OF MO
FAIRVIEW PHARMACY SERVICES LLC
INTERCHANGE RX LLC dba PALLIATIVE DRUG CARE
MEDONE, LC
TMESYS LLC
CORPORATE PHARMACY SERVICES INC
HOSPITALITY RX LLC
PHARMAPIX INTERNATIONAL LLC
SCRIP WORLD, LLC
EHO360, LLC
MAGELLAN RX MANAGEMENT LLC
SAGILITY LLC FKA HGS HEALTHCARE, LLC
CIGNA HEALTH AND LIFE INSURANCE COMPANY
PROCARE PHARMACY BENEFIT MANAGER INC
SCRIPT CARE, LTD
WELLDYNERX, LLC
Serve You Custom Prescription Management, Inc.
EXPRESS SCRIPTS ADMINISTRATORS LLC
HUMANA PHARMACY SOLUTIONS INC
OPTUMRX, INC
CAREMARK L.L.C.
CAREMARKPCS HEALTH LLC
CAREMARKPHC LLC
CENTENE PHARMACY SERVICES previously ENVOLVE PHARMACY SOLUTIONS INC
CHANGE HEALTHCARE PHARMACY SOLUTIONS, INC.
PHARMA FORCE GROUP, LLC
PROGYNY, INC.
AMWINS GROUP BENEFITS INC
ELIXIR RX SOLUTIONS, LLC. fka Envision
GATEWAY PHARMACY NETWORKS, LLC
INDEPENDENT HEALTH'S PHARMACY BENEFIT DIMENSIONS, LLC
INGENIORX, INC
MEDALIST RX LLC
NAVITUS HEALTH SOLUTIONS LLC
BENECARD SERVICES INC
CAPITAL RX, INC
HEALTHCARE HIGHWAYS RX, LLC
HEALTHSMART RX SOLUTINOS, INC.
INTEGRATED PRESCRIPTION MANAGEMENT, INC.
MEDIMPACT HEALTHCARE SYSTEMS INC
NAHGA INC
PERFORMRX, LLC
PRIME THERAPEUTICS LLC
TOWERS ADMINISTRATORS LLC
SOUTHERN SCRIPTS, LLC
TRHC TPA, LLC
WITHME HEALTH, LLC
KROGER PRESCRIPTION PLANS, INC.

Complaints Received September 1, 2020 through March 31, 2021

Complaint Type	Total # of Complaints that include this violation type (by SBS/OID #)	Total Alleged Violations within Complaints	Violations Identified by OID	Resolved by Hearing	Resolved by Consent Agreement	Application for New license submitted by PBM	New License Issued	Violations Identified by OID & Resolved by Settlement	Resolved by Settlement between OID & PBM*	\$ Amount Resolved / Refunded per Settlement*	Closed: No Violation; Lack of Evidence; or Lack of Complainant Cooperation	Closed: Allegation Withdrawn	Closed: Refund to be issued / Agreed Resolution between PBM & Complainant	\$ Amount of Agreed Resolution Refunds	Closed: PBM Increased Reimbursement to Pharmacy / Agreed Resolution	\$ Amount of Resolved by Agreement Additional Reimbursements to Pharmacies	# of Fines / Penalties Imposed	\$ Amount of Fines/Penalties Imposed	Pending Resolution	OID Identified Violations Pending Resolution
								* ALLOCATION & DISTRIBUTION OF SOME PORTIONS OF COLLECTED FUNDS ARE SUBJECT TO COURT RULINGS												
Transaction Fees	11	18,754	149,534					149,534	5,055	\$ 1,382,081.20	5,317	1,742	4,660	\$ 5,984.02			32,900	\$ 2,692,500.00	1,980	
MAC Pricing	69	6,741							118	\$ 2,927.84	4,833	716			32	\$ 1,318.68	41	\$ 64,029.36	1,042	
Choice Restriction - Referred to PBM Owned Mail Order	289	289									288	1								
Choice Restriction - Referred to PBM Owned Specialty	37	37									37									
Copay & Diff Mail vs Retail	50	50									49	1								
Not Able to Contract with PBM	52	52									52									
Mail Opt-Out Denied	2	2									2									
Network Enrollment/Participation Charge	3	3									3									
P&T Formulary	2	2									2									
Partial Referral List	1	1									1									
Restrictions Against Consumer Facing Materials	3	4									4									
Restriction During Emergency	5	5									5									
PBM-Retro Claim Adjustment	6	6									6									
Retail Paid Less Than PBM Owned	4	4									4									
Pharmacy Network Access (aka "Geo Access")	9	9									8	1								
Operating Without a License																				
<b>COMPLAINT TOTALS</b>	<b>543</b>	<b>25,959</b>	<b>149,534</b>					<b>149,534</b>	<b>5,173</b>	<b>\$ 1,385,009.04</b>	<b>10,611</b>	<b>2,461</b>	<b>4,660</b>	<b>\$ 5,984.02</b>	<b>32</b>	<b>\$ 1,318.68</b>	<b>32,941</b>	<b>\$ 2,756,529.36</b>	<b>3,022</b>	

COMPLAINTS RECEIVED 2ND QUARTER - 2021 (April 1, 2021 - June 30, 2021)

Complaint Type	Total # of Complaints that include this violation type (by SBS/OID #)	Total Alleged Violations within Complaints	Violations Identified by OID	Resolved by Hearing	Resolved by Consent Agreement	Application for New license submitted by PBM	New License Issued	Violations Identified by OID & Resolved by Settlement	Resolved by Settlement between OID & PBM*	\$ Amount Resolved / Refunded per Settlement*	Closed: No Violation; Lack of Evidence; or Lack of Complainant Cooperation	Closed: Allegation Withdrawn	Closed: Refund to be issued / Agreed Resolution between PBM & Complainant	\$ Amount of Agreed Resolution Refunds	\$ Amount of Resolved by Agreement by Additional Reimbursements to Pharmacies	# of Fines / Penalties Imposed	\$ Amount of Fines / Penalties Imposed	Pending Resolution	OID Identified Violations Pending Resolution		
* ALLOCATION & DISTRIBUTION OF SOME PORTIONS OF COLLECTED FUNDS ARE SUBJECT TO COURT RULINGS																					
Transaction Fees			9,613					9,613		\$ 480,661.65											
MAC Pricing																					
Choice Restriction - Referred to PBM Owned	10	10									10							0	0		
Copy & Diff Mail vs Retail																					
Not Able to Contract with PBM Mail Opt-Out Denied	2	2									2							0	0		
Network Enrollment/Participation Charge																					
P&T Formulary																					
Partial Referral List																					
Restrictions Against Consumer Facing Materials																					
Restriction During Emergency																					
PBM-Retro Claim Adjustment	2	2									1	1						0	0		
Retail Paid Less Than PBM Owned																					
Pharmacy Network Access (aka "Geo Access")																					
Operating Without a License			10		4	7	7				2	1				27	2,700		2		
<b>COMPLAINT TOTALS</b>	<b>14</b>	<b>14</b>	<b>9,623</b>		<b>4</b>	<b>7</b>	<b>7</b>	<b>9,613</b>		<b>\$ 480,661.65</b>	<b>15</b>	<b>2</b>				<b>27</b>	<b>2,700</b>	<b>0</b>	<b>2</b>		

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	Violations Identified by OID	Resolved by Hearing	Resolved by Consent Agreement	Application for New license submitted by PBM	New License Issued	Violations Identified by OID & Resolved by Settlement	Resolved by Settlement between OID & PBM*	\$ Amount Resolved / Refunded per Settlement*	Closed: No Violation; Lack of Evidence; or Lack of Complainant Cooperation	Closed: Allegation Withdrawn	Closed: Refund to be issued / Agreed Resolution between PBM & Complainant	\$ Amount of Agreed Resolution Refunds	Closed: PBM Increased Reimbursement to Pharmacy / Agreed Resolution	\$ Amount of Resolved by Agreement Additional Reimbursements to Pharmacies	# of Fines / Penalties Imposed	\$ Amount of Fines / Penalties Imposed	Pending Resolution	OID Identified Violations Pending Resolution
								* ALLOCATION & DISTRIBUTION OF SOME PORTIONS OF COLLECTED FUNDS ARE SUBJECT TO COURT RULINGS												
Transaction Fees	54	60,060	1,768					1,768	18,339	\$ 576,826.73	18,414	7,730	6,068	\$ 4,820.36					9,509	
MAC Pricing	113	29,996									2,831	433			\$ 1,019.00	\$ 181,380.71			25,713	
Choice Restriction - Referred to PBM Owned	18	18									17	1								
Copay Incentive	2	2									2									0
Not Able to Contract with PBM																				
Mail Opt-Out Denied																				
Network Enrollment/Participation Charge																				
P&T Formulary																				
Partial Referral List																				
Restrictions Against Consumer Facing Materials																				
Restriction During Emergency																				
PBM-Retro Claim Adjustment																				
Retail Paid Less Than PBM Owned																				
Pharmacy Network Access (aka "Geo Access")																				
Operating Without a License																				
Other: PBM withdrew \$ from Rx bank account	2	1,255									1		1,254	\$ 31,350.00						-
<b>COMPLAINT TOTALS</b>	<b>189</b>	<b>91,331</b>	<b>1,768</b>					<b>1,768</b>	<b>18,339</b>	<b>\$ 576,826.73</b>	<b>21,265</b>	<b>8,164</b>	<b>7,322</b>	<b>\$ 36,170.36</b>	<b>\$ 1,019.00</b>	<b>\$ 181,380.71</b>			<b>35,223</b>	

COMPLAINTS RECEIVED 4TH QUARTER - 2021 (October 1, 2021 - December 31, 2021)

Complaint Type	Total # of Complaints that include this violation type (by SBS/OID #)	Total Alleged Violations within Complaints	Violations Identified by OID	Resolved by Hearing	Resolved by Consent Agreement	Application for New license submitted by PBM	New License Issued	Violations Identified by OID & Resolved by Settlement	Resolved by Settlement between OID & PBM*	\$ Amount Resolved / Refunded per Settlement*	Closed: No Violation; Lack of Evidence; or Lack of Complainant Cooperation	Closed: Allegation Withdrawn / Agreed Resolution Other	Closed: Refund to be issued / Agreed Resolution between PBM & Complainant	\$ Amount of Agreed Resolution Refunds	Closed: PBM Increased Reimbursement to Pharmacy / Agreed Resolution	\$ Amount of Resolved by Agreement Additional Reimbursements to Pharmacies	# of Fines / Penalties Imposed	\$ Amount of Fines / Penalties Imposed	Complaint Allegations Pending Resolution	OID Identified Violations Pending Resolution
								* ALLOCATION & DISTRIBUTION OF SOME PORTIONS OF COLLECTED FUNDS ARE SUBJECT TO COURT RULINGS												
Transaction Fees	12	18,531							7,326	\$ 183,652.18	4,660									6,545
MAC Pricing	22	17,547									1,760	15								15,772
Choice Restriction - Referred to PBM Owned	3	3									2									3
Copay Incentive																				
Not Able to Contract with PBM																				
Mail Opt-Out Denied																				
Network Enrollment/Participation Charge	1	1									1									
P&T Formulary																				
Partial Referral List																				
Restrictions Against Consumer Facing Materials																				
Restriction During Emergency																				
PBM-Retro Claim Adjustment																				
Retail Paid Less Than PBM Owned																				
Pharmacy Network Access (aka "Geo Access")																				
Operating Without a License																				
Other/Undetermined	3	3									3									
<b>COMPLAINT TOTALS</b>	<b>41</b>	<b>36,085</b>							<b>7,326</b>	<b>\$ 183,652.18</b>	<b>6,426</b>	<b>15</b>								<b>22,318</b>

COMPLAINTS RECEIVED 1st QUARTER - 2022 (January 1, 2022 - March 31, 2022)

Complaint Type	Total # of Complaints that include this violation type (by SBS/OID #)	Total Alleged Violations within Complaints	Violations Identified by OID	Resolved by Hearing	Resolved by Consent Agreement	Application for New license submitted by PBM	New License Issued	Violations Identified by OID & Resolved by Settlement	Resolved by Settlement between OID & PBM*	\$ Amount Resolved / Refunded per Settlement*	Closed: No Violation; Lack of Evidence; or Lack of Complainant Cooperation	Closed: Allegation Withdrawn	Closed: Refund to be issued / Agreed Resolution between PBM & Complainant	\$ Amount of Agreed Resolution Refunds	Closed: PBM Increased Reimbursement to Pharmacy / Agreed Resolution	\$ Amount of Resolved by Agreement Additional Reimbursements to Pharmacies	# of Fines / Penalties Imposed	\$ Amount of Fines/Penalties Imposed	Pending Resolution	OID Identified Violations Pending Resolution
								* ALLOCATION & DISTRIBUTION OF SOME PORTIONS OF COLLECTED FUNDS ARE SUBJECT TO COURT RULINGS												
Transaction Fees	13	10,872									1,577								9,295	
MAC Pricing	22	12,699									953	60							11,686	
Choice Restriction - Referred to PBM Owned	12	12									5								7	
Network Enrollment/Participation Charge	1	1									1								-	
Copay Incentive	3	3									3	-							-	
Not Able to Contract with PBM																				
P&T Formulary																				
Partial Referral List																				
Restrictions Against Consumer Facing Materials																				
PBM-Retro Claim Adjustment																				
Retail Paid Less Than PBM Owned																				
Pharmacy Network Access (aka "Geo Access")	-	-																	-	-
Operating Without a License																				
<b>COMPLAINT TOTALS</b>	<b>51</b>	<b>23,587</b>	<b>-</b>								<b>2,539</b>	<b>60</b>							<b>20,988</b>	<b>-</b>

COMPLAINTS RECEIVED 2nd QUARTER - 2022 (April 1, 2022 - June 30, 2022)

Complaint Type	Total # of Complaints that include this violation type (by SBS/OID #)	Total Alleged Violations within Complaints	Violations Identified by OID	Resolved by Hearing	Resolved by Consent Agreement	Application for New license submitted by PBM	New License Issued	Violations Identified by OID & Resolved by Settlement	Resolved by Settlement between OID & PBM*	\$ Amount Resolved / Refunded per Settlement*	Closed: No Violation; Lack of Evidence; or Lack of Complainant Cooperation	Closed: Allegation Withdrawn / Agreed Resolution Other	Closed: Refund to be issued / Agreed Resolution between PBM & Complainant	\$ Amount of Agreed Resolution Refunds	Closed: PBM Increased Reimbursement to Pharmacy / Agreed Resolution	\$ Amount of Resolved by Agreement Additional Reimbursements to Pharmacies	# of Fines / Penalties Imposed	\$ Amount of Fines/Penalties Imposed	Complaint Allegations Pending Resolution	OID Identified Violations Pending Resolution
								* ALLOCATION & DISTRIBUTION OF SOME PORTIONS OF COLLECTED FUNDS ARE SUBJECT TO COURT RULINGS												
Transaction Fees	7	8,705									1,748								6,957	
MAC Pricing	37	4,369									542				911	\$ 41,100.03			2,916	
Choice Restriction - Referred to PBM Owned	86	86									17								69	
Copy Incentive	6	6									4								2	
Not Able to Contract with PBM	1	1									1								-	
Mail Opt-Out Denied																				
Network Enrollment/Participation Charge																				
P&T Formulary																				
Partial Referral List																				
Restrictions Against Consumer Facing Materials																				
Restriction During Emergency																				
PBM-Retro Claim Adjustment																				
Retail Paid Less Than PBM Owned																				
Pharmacy Network Access (aka "Geo Access")																				
Operating Without a License																				
Other Alleged Violations	2	685																	685	
<b>COMPLAINT TOTALS</b>	<b>139</b>	<b>13,852</b>									<b>2,312</b>	<b>-</b>			<b>911</b>	<b>\$ 41,100.03</b>			<b>10,629</b>	<b>0</b>



COMPLAINTS RECEIVED 3rd QUARTER - 2022 (July 1, 2022 - Sept 30, 2022)

Complaint Type	Total # of Complaints that include this violation type (by SBS/OID #)	Total Alleged Violations within Complaints	Violations Identified by OID	Resolved by Hearing	Resolved by Consent Agreement	Application for New license submitted by PBM	New License Issued	Violations Identified by OID & Resolved by Settlement	Resolved by Settlement between OID & PBM*	\$ Amount Resolved / Refunded per Settlement*	Closed: No Violation; Lack of Evidence; or Lack of Complainant Cooperation	Closed: Allegation Withdrawn / Agreed Resolution Other	Closed: Refund to be issued / Agreed Resolution between PBM & Complainant	\$ Amount of Agreed Resolution Refunds	Closed: PBM Increased Reimbursement to Pharmacy / Agreed Resolution	\$ Amount of Resolved by Agreement Additional Reimbursements to Pharmacies	# of Fines / Penalties Imposed	\$ Amount of Fines/Penalties Imposed	Alleged Violations Pending Resolution	OID Identified Violations Pending Resolution
								* ALLOCATION & DISTRIBUTION OF SOME PORTIONS OF COLLECTED FUNDS ARE SUBJECT TO COURT RULINGS												
Transaction Fees	1	2,227																	2,227	
MAC Pricing	7	4,315									1								4,314	
Choice Restriction - Referred to PBM Owned	74	2,208									9								2,199	
Copay Incentive	8	8									1								7	
Not Able to Contract with PBM																				
Mail Opt-Out Denied																				
Network Enrollment/Participation Charge																				
P&T Formulary																				
Partial Referral List																				
Restrictions Against Consumer Facing Materials																				
Restriction During Emergency																				
PBM-Retro Claim Adjustment																				
Retail Paid Less Than PBM Owned																				
Network or Geo Access Complaints (Initiated Outside OID)	1	1	-																1	
Operating Without a License			-																	
Other Alleged Violations	1	5																	5	
<b>COMPLAINT TOTALS</b>	<b>92</b>	<b>8,764</b>									<b>11</b>								<b>8,753</b>	

COMPLAINTS RECEIVED 4th QUARTER - 2022 (October 1, 2022 - December 31, 2022)

Complaint Type	Total # of Complaints that include this violation type (by SBS/OID #)	Total Alleged Violations within Complaints	Violations Identified by OID	Resolved by Hearing	Resolved by Consent Agreement	Application for New license submitted by PBM	New License Issued	Violations Identified by OID & Resolved by Settlement	Resolved by Settlement between OID & PBM*	\$ Amount Resolved / Refunded per Settlement*	Closed: No Violation; Lack of Evidence; or Lack of Complainant Cooperation	Closed: Allegation Withdrawn / Agreed Resolution Other	Closed: Refund to be issued / Agreed Resolution between PBM & Complainant	\$ Amount of Agreed Resolution Refunds	Closed: PBM Increased Reimbursement to Pharmacy / Agreed Resolution	\$ Amount of Resolved by Agreement Additional Reimbursements to Pharmacies	# of Fines / Penalties Imposed	\$ Amount of Fines/Penalties Imposed	Pending Resolution	OID Identified Violations Pending Resolution
								* ALLOCATION & DISTRIBUTION OF SOME PORTIONS OF COLLECTED FUNDS ARE SUBJECT TO COURT RULINGS												
Transaction Fees																				
MAC Pricing																				
Choice Restriction - Referred to PBM Owned	28	6,100																	6,100	
Copay Incentive																				
Not Able to Contract with PBM																				
Mail Opt-Out Denied																				
Network Enrollment/Participation Charge																				
P&T Formulary																				
Partial Referral List																				
Restrictions Against Consumer Facing Materials																				
Restriction During Emergency																				
PBM-Retro Claim Adjustment																				
Retail Paid Less Than PBM Owned																				
Network or Geo Access Complaints (Initiated Outside OID)																				
Operating Without a License																				
Other Alleged Violations																				
<b>COMPLAINT TOTALS</b>	<b>28</b>	<b>6,100</b>					<b>6,100</b>													<b>6,100</b>