

# Published Questions and Answers

**RFI # 2025-001 (PBMA)**

**Date of publication: December 30, 2025**

Appendix F is the Question and Answers Template to be used by Responders when submitting questions to PRHIA regarding this RFI.

## Instructions:

Please submit all your questions using this template. For each question, first include the specific section number to which the question pertains. Then provide the specific page number of the document that the question pertains to and provide the detailed question. All questions submitted in this Template are subject to the conditions set forth in this RFI. **Please only submit questions using this Template and send as a WORD document only. Questions sent in other formats (e.g., PDF) will not be accepted. PRHIA reserves the right to disregard any questions that have not been submitted using this template.**

#	Section #	Page #	Questions	Answers
1	I	3	The RFI states “this RFI is being issued solely for information purposes” and implies that a future RFP may be issued to procure requested services. Because public release of the RFI response could potentially affect competition on any future RFP, can PRHIA confirm that all RFI responses will remain confidential until a contract is awarded for this work?	As stated in Section I, the information gathered in this RFI will help PRHIA develop a future RFP tailored to its specific needs. Thus, and considering that this RFI is not a competitive process, it is not PRHIA’s intention to disclose the information gathered under this RFI, as it is considered part of the work product development of a future RFP.
2	I	3	If PRHIA plans to make responses public (released through FOIA), may responders submit a redacted version (remove all confidential, proprietary, and trade secret information) for public/FOIA release?	Although it is not PRHIA’s intention to disclose the information received under this RFI (see previous answer), Respondents may submit a redacted version of their response if they wish to do so.
3	I	3	Will PRHIA use the responses to the RFI to prequalify providers seeking to provide such services?	No. As stated in Section I, this RFI is being issued for information purposes only. A Request for Qualifications (RFQ) has not been made part of this RFI.
4	I	3	Is there a page limit for the response?	No.

5	1.1 Audit Services	12	What does PRHIA hope to accomplish by conducting the requested audits, are they addressing a known issue with their current arrangement, or performing routine due diligence through a third-party review?	PRHIA is conducting a comprehensive evaluation of its operations and implementing a series of strategic initiatives to enhance compliance with federal Medicaid regulations, as well as Program Integrity and Compliance standards. This RFI, along with a potential future RFP, is an integral part of these ongoing efforts.
6	1.1.6	13	Will we be required to conduct an analysis of paid claims by contacting independent pharmacies to validate compliance with prompt payment?	At this moment, PRHIA is not planning to include direct contact with pharmacies in the Scope of Work. This may be considered in a future RFP if PRHIA determines it is necessary.
7	1.1.7	13	Is PRHIA requesting a Direct and Indirect Remuneration (DIR) validation?	This will likely be included in the Scope of Work for a future RFP; however, it will depend on PRHIA's needs and final perspective regarding this service.
8	2.2.2	4-5	Please clarify the audit rights associated with the applicable contracting structure, does PRHIA have a direct contract, or does it operate under a GPO arrangement?	PRHIA generally enters into direct contractual agreements with its providers, as is the case with the Pharmacy Benefit Manager (PBM). Accordingly, PRHIA possesses the contractual authority to audit all services rendered under these agreements.
9	4.2	8	Will PRHIA provide the names of all vendors who have submitted questions for this RFI with the copy of all the submitted questions and the corresponding responses?	No. PRHIA will only publish the questions received along with PRHIA's answers.
10	Appendix B - Contract No. 2023-000048	1-133	After reviewing PRHIA's PBM contract, we were unable to identify any provisions specifying audit rights or defining the allowable number of sample claims for audit. Could you please confirm whether a separate agreement or contract outlines the client's audit rights which include a maximum number of sample claims allowed for review?	Section 7.6.1.16 of the Contract states that the Department of Health and Human Services (DHHS) and its sub-agencies and PRHIA shall have the right to inspect, evaluate, and audit any pertinent books, financial records, documents, papers, records of any Network Pharmacy involving financial transactions related to the Government Health Plan (GHP).

				<p>Also, Sections 35.2.3-35.2.4 establish that PRHIA, CMS, the Office of Inspector General, the Comptroller General, the Medicaid Fraud Control Unit, and their respective designees shall have the right at any time to inspect, evaluate, and audit any pertinent records or documents of the Contractor and Subcontractor, and may inspect the premises, physical facilities, equipment, computers or other electronic systems where activities or work related to the GHP program is conducted. This right to audit exists for ten (10) years from the final date of the Contract Period or from the date of completion of any audit, whichever is later. Also, it is established that PRHIA “shall have unlimited rights to use, disclose, and duplicate all Information and Data in any way relating to this Contract in accordance with applicable Puerto Rico and federal laws and regulations”.</p> <p>Considering these clauses, any further specification of audit rights, including a maximum number of sample claims allowed for review, would have to be established in a separate agreement or contract amendment.</p>
11	Appendix B - Contract No. 2023-000048	1-133	To ensure we provide the most accurate, cost-appropriate, and detailed responses, we would like to review the pricing, rebate, and performance guarantee contract language. Will we be granted access to pricing and rebate contract language including a separate exhibit for PBM performance guarantees necessary to audit the PBM?	Further and specific information related to this matter could be part of an RFP process, where proponents could have access to certain proprietary information under the appropriate confidentiality agreements.
12	General	N/A	Can PRHIA please provide further direction on the form and manner in which exceptions to terms and conditions are to be submitted?	Appendix D states that the responses to each question must follow the same order of the questions in Appendix D. Any exception in the services or other

				terms required by the RFI should be included as the response to the corresponding question in Appendix D.
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