Timeline of Change Healthcare cyberattack events for community pharmacy

- Wednesday, February 21
    - o Cyberattack detected, UHG later reports that out of an abundance of caution they took all systems offline
    - o Pharmacists lament on social media that OptumRx claims, CHC claims switch not working
    - o UHG files SEC Form 8-K reporting it "*…identified a suspected nation-state associated cyber security threat actor had gained access to some of the Change Healthcare information technology systems…*"
    https://www.sec.gov/ixviewer/ix.html?doc=/Archives/edgar/data/731766/000073176624000045/unh-20240221.htm

- Thursday, February 22
    - o Express Scripts sends a bulletin to its pharmacy network; mentions CHC announced a cyber security incident occurred on 2/21
    - o First outreach from a news outlet to see if NCPA is hearing from members affected by outage
    - o Healthcare Ready tweets that it is poised to activate the RxOpen.org pharmacy locator
    https://x.com/HC_Ready/status/1760719131161006348
        - ▪ NCPA outreach to HcR concerning easily misinterpreted status (i.e. pharmacy may not have transacted claims electronically within last 12 hours, but may still be open and able to help patients)
        - ▪ In the end, HcR did not activate Rx Open
        https://x.com/TomCotterER/status/1761047667939905895
    - o OptumRx status page says outage will last at least through Thursday night ; status later clarified that OptumRx is processing claims, but many pharmacies perceive an outage because they are using the CHC claims switch or a technology partner disconnected to prevent harm to its clients.

- Friday, February 23
    - o Multiple news outlets reach out to get comment on how independent pharmacies are affected by this multi-day outage.
    - o Pharmacies report receiving fax dated 2/22 "obviously a day late"
    - o Utah Medicaid sends network bulletin reports that outage could last through the end of the day or longer.
        - ▪ Bulletin includes alternate workflow for claims which relies on eligibility verification using an online portal and manually filling out a form to request reimbursement.
        - ▪ *Steps to process Medicaid FFS pharmacy claims:*
            - • *1. Verify eligibility through the Eligibility Lookup Tool .*
            - • *2. Fill a new prescription or a refill prescription for up to 30 days as cash pay. Note: Prior authorization edits and early refill edits will be overridden when your claims are reconciled.*
            - • *3. Dispense the prescription(s) to the member at no charge.*

- *4. Submit the pharmacy interim payment [form](#) to Medicaid for an interim payment to cover your costs. Submissions received by Wednesday at 9 pm will be paid during that weekend payment cycle. Anything received after that time will be paid the following weekend.*

- Sunday, February 25
  - NCPA invited to a service disruption update later in the day on 2/25. NCPA senior director-level staff received the invite and requested invitation be extended to NCPA CEO.
    - Information focused on medical / health plan providers
    - Pharmacy not mentioned
  - A NCPA member emails NCPA asking for help insisting that wholesalers relax purchase payoff timelines

- Monday, February 26
  - NCPA obtains undated OptumRx cybersecurity incident FAQ sent to a PSAO; PSAO received it on 2/26
  - NCPA obtains fax dated 2/22 to unknown audience, mentions the state Medicaid programs that are offline (IA, WY, ME, VT, IL, and UT).

- Tuesday, February 27
  - NCPA posts update in morning newsletter qAM: https://www.ncpa.org/newsroom/qam/2024/02/26/sub-optimal-info-shared-cyber-attack
  - Undated letter from Wyoming Medicaid offers advanced payment to pharmacies (estimated date)
  - Change Healthcare Service Disruption Update webcast

- Thursday, February 29
  - NCPA received copy of undated letter to pharmacy partners from Optum CEO

- Friday, March 1
  - NCPA receives bulletins sent to pharmaices regarding Medicaid outages (VT and WY; OptumRx to its network)
  - NCPA publishes the joint Cybersecurity Advisory in the qAM newsletter: https://ncpa.org/newsroom/qam/2024/03/01/government-cybersecurity-notice-puts-pharmacies-notice
  - Pharmacy organizations send joint letter to Change Healthcare and open letter to PBMs: https://ncpa.org/newsroom/news-releases/2024/03/01/pharmacy-associations-join-forces-advocate-pharmacists-during
  - Change Healthcare Service Disruption Update webcast

- Monday, March 4
  - AHA sends letter to UHG criticizing the Temporary Funding Assistance program: https://www.aha.org/system/files/media/file/2024/03/Letter-AHA-Expresses-Concerns-with-UHG-Program-in-Response-to-Cyberattack-on-Change-Healthcare..pdf

- Tuesday, March 5
  - Services outage update from UHG reports claims switch service could be restored as soon as 3/6. (Date of restoration unknown; companies that flipped to RelayHealth had little incentive to go back to CHC; 3/8 bulletin from Utah Medicaid points to 3/7)
  - Change Healthcare Service Disruption Update webcast

- Wednesday, March 6
  - NCPA publishes qAM update on current status: https://ncpa.org/newsroom/qam/2024/03/06/getting-back-online-after-cyberattack-help-could-come-soon
  - CMS memo urging Part D plans "removing or relaxing utilization management and timely filing requirements as appropriate.": https://ncpa.org/sites/default/files/2024-03/hpms_memo_on_change_healthcare_cyberattack.pdf
  - New York State Department of Financial Services sends drafts of a letter and form to address suspending utilization management and other health plan requirements for health plans authorized in NY https://www.dfs.ny.gov/industry_guidance/circular_letters/cl2024_02
  - CMS issues HPMS memo: https://www.cms.gov/about-cms/information-systems/hpms/hpms-memos-archive-weekly/hpms-memo-change-healthcare-cyberattack (emphasis added on excerpts below)
    - *"We expect Medicare Advantage (MA) organizations and Part D sponsors to continue to provide access to covered benefits without disruption by executing their business continuity plans and **removing or relaxing utilization management and timely filing requirements as appropriate**. CMS is also encouraging MA organizations to offer advance funding to providers most affected by this cyberattack."*
    - *"We encourage MA organizations to **offer advance funding to providers** most affected by this cyberattack."*

- Thursday, March 7
  - NACDS sends letter to HHS and CMS: https://www.nacds.org/news/nacds-letter-to-hhs-cms-urges-immediate-action-to-preserve-americans-access-to-care-amid-disruption-caused-by-change-healthcare-cyberattack/

- Friday, March 8
    - NCPA publishes qAM newsletter highlighting CMS update:
      https://ncpa.org/newsroom/qam/2024/03/08/will-part-d-plans-rally-help-pharmacies-affected-cyberattack-change
    - Letter from Optum Insight to pharmacy partners reporting progress on eRx solution but notes that additional "hotspots" are infusion services and couponing
    - Frier Levitt blog regarding CHC plan announced earlier in the year to end discount card programs:
      https://www.frierlevitt.com/articles/change-healthcare-announces-it-is-ceasing-prescription-discount-card-processing-services/
    - Utah update reports that Medicaid is still experiencing outage despite other claims submission restored the day prior. https://dhhs.utah.gov/featured-news/change-healthcare-outage-continues-to-impact-utah-medicaid/
    - Change Healthcare Service Disruption Update webcast
        - Screenshot from 3/8 update on the cyber response page touting OptumRx mailorder as a solution.

> **Timeline to Restore Change Healthcare Systems**
>
> We are working aggressively on the restoration of our systems and services. Assuming we continue at our current rate of progress, we expect our key system functionality to be restored and available on the following timelines:
>
> - **Pharmacy services**: Electronic prescribing is now fully functional with claim submission and payment transmission also available as of today. We have taken action to make sure patients can access their medicines in the meantime, including Optum Rx pharmacies sending members their medications based on the date needed.
> - **Payments platform**: Electronic payment functionality will be available for connection beginning March 15.
> - **Medical claims**: We expect to begin testing and reestablish connectivity to our claims network and software on March 18, restoring service through that week.
>
> While we work to restore these systems, we strongly recommend our provider and payer clients use the applicable workarounds we have established—in particular, using our new iEDI claim submission system in the interest of system redundancy given the current environment.

- Saturday, March 9
    - CMS announces Change Healthcare/Optum Payment Disruption (CHOPD) accelerated payments to Part A providers and advance payments to Part B suppliers: https://www.cms.gov/newsroom/press-releases/cms-statement-continued-action-respond-cyberattack-change-healthcare

- Sunday, March 10
  - Letter from HHS Secretary Becerra: https://www.hhs.gov/about/news/2024/03/10/letter-to-health-care-leaders-on-cyberattack-on-change-healthcare.html
  - Letter from HHS Becerra and DOL Acting Secretary Su urges additional response from United Health Group as well as other insurance companies to ensure access to "help providers make payroll and deliver timely care to the American people." https://www.hhs.gov/about/news/2024/03/10/letter-to-health-care-leaders-on-cyberattack-on-change-healthcare.html

- Tuesday, March 12
  - "*On Tuesday, March 12, the U.S. Department of Health and Human Services (HHS) Secretary Xavier Becerra and Deputy Secretary Andrea Palm, led a convening of health care community leaders – joined by White House Domestic Policy Advisor Neera Tanden, White House Deputy National Security Advisor (DNSA) for Cyber and Emerging Technologies Anne Neuberger, and others from the federal government – to discuss concrete actions to mitigate harms to patients and providers caused by the cyberattack on Change Healthcare.*" https://www.hhs.gov/about/news/2024/03/12/readout-biden-harris-administration-convening-health-care-community-concerning-cyberattack-change-healthcare.html
    - *"Health care payers were then called upon and committed to continued coordination to meet the need – considering additional steps to reduce red tape, provide accessible funding opportunities through advanced payments, and through other means to provide productive solutions to address the cash flow issues that providers are experiencing."*
    - CMS release on the same meeting: https://www.cms.gov/newsroom/press-releases/cms-statement-following-health-care-payer-and-provider-roundtable-cyberattack-change-healthcare
  - NCPA Tech Committee members report extensive issues remain with copay coupons still not working and patients not able to afford copays from the PBM

- Wednesday, March 13
  - NCPA publishes qAM newsletter highlighting roundtable: https://ncpa.org/newsroom/qam/2024/03/13/insurance-plans-sitting-premium-dollars-instead-helping-providers-after
  - Multiple pharmacies receive an audit notice from OptumRx; PAAS summary indicates these are "driven by a CMS National Audit" on Part D or MAPD plans and OptumRx requires information pharmacies may have: https://granepbm.com/wp-content/uploads/2023/12/Medical_Supplies_Associated_with_the_Delivery_of_Insulin_Audit_Notification_Memo.pdf
  - CMS posts an FAQ document for the Change Healthcare/ Optum Payment Disruption (CHOPD) Accelerated and Advance Payments for Part A Providers and Part B Suppliers program: https://www.cms.gov/newsroom/fact-sheets/change-healthcare/optum-payment-disruption-chopd-accelerated-and-advance-payments-part-providers-and

- o CMS reports it is instructing MACs on CHOPD
- o HHS OCR announces it opened an investigation into the cyberattack: https://www.hhs.gov/about/news/2024/03/13/hhs-office-civil-rights-issues-letter-opens-investigation-change-healthcare-cyberattack.html
- o Utah Medicaid update reports that claims submission has been restored and certain requirements are suspended until it has full restoration of its system. https://dhhs.utah.gov/featured-news/change-healthcare-and-utah-medicaid-launch-first-phase-of-pharmacy-system-restoration/

- Thursday, March 14
  - o NCPA publishes qAM newsletter highlighting White House meeting: https://ncpa.org/newsroom/qam/2024/03/14/white-house-meets-uhg-about-cyber-attack
    - *"On Feb. 27, UnitedHealth reported that 90 percent of American pharmacies had to adjust their claims processing to mitigate the attack, and pharmacy teams had to hustle to find work-arounds — all amid a sluggish initial response from PBMs who offered little to no guidance on how to push through the incident."*

- Friday, March 15
    - Call between NCPA and OptumRx leadership to underscore that independent pharmacies are unhappy with the amount of claims that still rely on manual processes to submit claims and patient harm due to coupons not working for lifesaving but expensive treatments (e.g. infused drugs, drugs in the specialty tier) and worried about audit liability. OptumRx reported that pharmacy claims volume is at 99% and 50% of coupon card volume is back online and more expected week of 3/18.

- Monday, March 18
  - o Change Healthcare Service Disruption Update webcast

- Tuesday, March 19
  - o NCPA publishes qAM newsletter: https://ncpa.org/newsroom/qam/2024/03/19/cyber-attack-disruptions-continue-additional-relief-available
    - Optum status page showed no restoration date for MedRx
    - Details to come re: modified audit program from OptumRx
  - o Briefing hosted by HHS/IEA, NCPA staff attended
    - Most messaging was for physician providers
    - Infusion pharmacies hotspot for lingering problems
    - Part B suppliers eligible for CMS CHOPD program; If the pharmacy was billing Medicare Part B (some vaccines, possibly diabetic supplies), they could be eligible to apply for advanced payment

and accelerated payments. The pharmacy should go through the MAC that they work with to get more information on how to do this.
- Letter from Congress to HHS https://www.ama-assn.org/system/files/us-congress-change-healthcare-cyberattack-letter-to-hhs.pdf

- Thursday, March 21
  - OptumRx fax blast regarding modified audit program sent to pharmacies
    - Modified through early April 2024
    - Claims filed during the outage but not submitted online will not be audited or reviewed. Pharmacies should notify OptumRx of inadvertent audit of claims from this time
    - Pharmacies should request additional time for CMS-directed audit (see 3/13 audit notice bullet above) if needed
    - Pharmacies may request extensions for other audits to be considered case-by-case
    - Provider relations: https://professionals.optumrx.com/resources/forms/pharmacyproviderrelationsform.html

- Friday, March 22
  - NCPA publishes qAM newsletter highlighting future predictions https://ncpa.org/newsroom/qam/2024/03/22/still-struggling-aftermath-uhg-cyber-attack
    - MedRx restoration forecast for week of March 25; includes the extensive formulary and edit functionality already built into the tool, but it will not include real-time eligibility for Part B, which is targeted to be restored by 3/29
    - Sets expectation for slow processing due to backlogged claims
    - UHG concedes there are ongoing issues with certain copay assistance programs
  - Website with some details about modified audit program from OptumRx https://professionals.optumrx.com/services/pharmacy-claims.html
  - Change Healthcare Service Disruption Update webcast

- Monday, March 25
  - Email from Elizabeth Wieand at HHS/IEA to health care provider stakeholders with letter from HHS, ASPR and CMS health plan national contact information requested on 3/12 roundtable hosted by HHS and DOL. Letter also urges providers to review and implement cybersecurity performance goals.
    - https://www.ama-assn.org/system/files/hhs-letter-and-appendix-to-providers.pdf
    - https://hphcyber.hhs.gov/performance-goals.html
  - UHG reports that the claims clearinghouse (medical network exchange) will be restored this week. Providers are reconnected incrementally

- Wednesday, March 27
    - o Email from OptumRx to pharmacy stakeholders
        - ▪ Still trying to clarify the Temporary Funding Assistance from Optum and whether pharmacies are eligible. Seems this hinges on whether pharmacy received any payments from OptumPay and NOT OptumRx. This means a very small number of pharmacies may be eligible https://www.optum.com/en/business/providers/health-systems/payments-lending-solutions/optum-pay/temporary-funding-assistance.html
        - ▪ Has asked for an update on the status of Allwin
        - ▪ "majority, although not all, of the coupons are now operational"
    - o Email from OptumRx to pharmacy stakeholders advising of communication sent to 5,500 pharmacies that receive paper checks for their coupon reimbursements. Paper check processing is not yet restored and these pharmacies can enroll in ACH payments to get these funds.
    - o Change Healthcare Service Disruption Update webcast (final event?)

- Friday, March 29
    - o UHG announces that MedRx is back online
        - ▪ Members report continued disruption; unclear whether MedRx and Allwin are the same or different services.
        - ▪ Dispensing system vendor reports they are underway with due diligence before reconnecting
        - ▪ UHG reports that the finance system for issuing paper checks to pharmacies for reimbursement for certain copay assistance programs is not restored and pharmacies should enroll for ACH payments
    - o In response to verification inquiry re: restoration of MedRx, Red Sail Technologies shared a communication to its clients that it is underway with due diligence and testing prior to reconnecting to MedRx
    - o Email from OptumRx to pharmacy stakeholders regarding Temporary Payment Advance Program
        - ▪ "*To help our pharmacy partners during these extraordinary circumstances, Optum Rx has created a limited duration cash advance process to support independent pharmacies in the Optum Rx Network. There are no fees or interest charged on cash advances*."
        - ▪ 38 days after incident that was initially supposed to be resolved over the first weekend.

- Tuesday, April 2
    - o Email from OptumRx to pharmacy stakeholders
        - ▪ All six of the FFS Medicaid programs are back online and claims are flowing
        - ▪ Still making progress on coupons, but some have had to be transitioned to other processors. Info: https://www.optum.com/en/csp.html

- Friday, April 5
    - o NCPA publishes qAM newsletter highlighting the coupon update https://ncpa.org/newsroom/qam/2024/04/05/coupons-update-change-healthcare

- Tuesday, April 9
    - Drug Channels blog reports that OptumRx processed 22% of prescription claims in 2023
      https://www.drugchannels.net/2024/04/the-top-pharmacy-benefit-managers-of.html

- Thursday, April 11
    - NCPA publishes qAM highlighting TRICARE network back online
      https://ncpa.org/newsroom/qam/2024/04/11/bright-lights-horizon-after-februarys-cyber-attack

- Friday, April 12
    - Prescripton drug supply chain stakeholder requests call to touch base following reports of second
      cyberattack on CHC (NCPA previously unaware of second attack,).

- Friday, April 19
    - HHC OCR posts new webpage with FAQs regarding the CHC cyberattack and HIPAA rules
      https://www.hhs.gov/hipaa/for-professionals/special-topics/change-healthcare-cybersecurity-incident-frequently-asked-questions/index.html
    - House Energy and Commerce Committee and Subcommittee on Oversight and Investigations announce
      hearing

- Monday, April 22
    - UnitedHealth Group announced support for people worried about PHI/PII breach including credit
      monitoring and identity theft protections https://www.unitedhealthgroup.com/newsroom/2024/2024-04-22-uhg-updates-on-change-healthcare-cyberattack.html and
      https://www.unitedhealthgroup.com/ns/health-data-breach.html

- Tuesday, April 23
    - Call with House E&C Oversight and Investigations Subcommittee to discuss CHC disruption and recovery.
      (NCPA staff: Kaite Krell, Anne Cassity, Lisa Schwartz, Andy Becker/Fruth Pharmacy)

- Wednesday, April 24
    - Members report that the support line for Allwin is forwarding to the prescription help desk which is not
      familiar with Part B claims and not able to provide needed support.
    - Member reports that claims submitted to Allwin are "captured" (this is the expected claim response for a
      medical billing intermediary), but he has yet to see payment/remittance advice from anything prior to
      February 20, 2024

- Wednesday, May 1
    - Senate Finance Committee hearing
    - House Energy and Commerce Committee and Subcommittee on Oversight and Investigations hearing