

Memo

To: Office of Management and Budget
 From: Alice Lee-Martin, Division of Clinical and Operational Performance, MDBG, CPC
 CC: Bonnie Harkless, OSORA
 Date: February 4, 2021
 Re: Non-material/non-substantive changes to Part D Reporting Requirements

It has been identified that six non-material and non-substantive changes need to be made to our currently approved Part D reporting requirements document, OMB # 0938-0992 (CMS-10185). An explanation for each change is listed below. In addition, a red-line document that identifies each change is provided. These changes do not increase, decrease, or otherwise change the burden associated with this data collection.

Reporting section	Old	New (Change)	Explanation
Cover page and Introduction	The document was last updated 12/31/07, and was in effect for Contract Year 2008.	These statements have been struck, and the document is effective as of January 1, 2009.	The deletion of the 2008 reference indicates these reporting requirements continue to be in effect for CY2009.
Retail, Home Infusion, and Long-Term Care Pharmacy Access	In subsection B, the document instructed Part D Sponsors to label the data file using the respective period in 2008.	These instructions have been updated to use file naming convention with 'CONTRACTYEAR'; Part D Sponsors will replace this with the appropriate contract year.	The deletion of the 2008 reference indicates these reporting requirements continue to be in effect for CY2009.
Medication Therapy Management Programs	In Subsection II – The layout for the data file to be uploaded at the Contract level did not include contract number; allowed HICN only; listed beneficiary middle initial as required; listed date formats as mm/dd/yyyy; and listed the field, "Reason participant discontinued MTMP" as a text field.	The layout for the data file has been updated to include contract number; to allow the entry of Railroad Retirement Board (RRB) number instead of HICN for RRB beneficiaries only; lists beneficiary middle initial as optional; lists date formats as CCYYMMDD; and lists the field, "Reason participant discontinued MTMP" as a character conditional field. For the "Reason participant discontinued MTMP", specific codes are provided for each discontinuation reason.	Field layout changes were necessary for Sponsors' submissions in CY2008. For example, the RRB number needed to be allowed in addition to the HICN for those RRB beneficiaries. Another example is changing the beneficiary middle initial from a required field to an optional field, since some beneficiaries do not have middle initials. Additionally, some changes reflect formal entry of data that are already provided by the Contract. For example, the Sponsor selects an individual contract number in HPMS prior to uploading this file. The file now

Reporting section	Old	New (Change)	Explanation
			contains the contract number to help Sponsors label their data files correctly. This change was especially needed by Sponsors uploading multiple files for multiple Part D contracts.
Pharmaceutical Manufacturer Rebates, Discounts and Other Price Concessions	The document instructed Part D Sponsors to label data files using the respective period in 2008.	These instructions have been updated to use file naming convention with 'CONTRACTYEAR'; Part D Sponsors will replace this with the appropriate contract year.	The deletion of the 2008 reference indicates these reporting requirements continue to be in effect for CY2009.
Long-term Care Rebates	The document instructed Part D Sponsors to label the data file using the respective period in 2008.	These instructions have been updated to use file naming convention with 'CONTRACTYEAR'; Part D Sponsors will replace this with the appropriate contract year.	The deletion of the 2008 reference indicates these reporting requirements continue to be in effect for CY2009.
Table 2. Changes made from CY2007 Reporting Requirements	This table listed changes made from CY2007 Reporting Requirements for the CY2008 document.	This table has been deleted.	As this document is being updated for CY2009, the table that lists changes between CY2007 and CY2008 is no longer applicable. It would be incorrect for CMS to provide a revised table that shows changes between CY2009 and CY2007.

Please contact me at Alice.Leemartin@cms.hhs.gov or 410 786-1103 if you have any questions. Thank you for your assistance.