

CROSSWALK DOCUMENT FOR PRA PACKAGE (CMS 10174)

Original Section	Explanation of Revision
Background and History	The section was updated to reflect the most current information and description of the Part D program. The original PRA clearance was granted during the initial year of program implementation.
Summary of PDE Data Fields and Prescription Drug Event Record Layout (Attachment)	<p>These sections were updated to reflect the addition of three data elements: Estimated Rebate Point-of-Sale, Vaccine Administration Fee, and Prescription Origin Code.</p> <p><u>Estimated Rebate Point-of-Sale:</u> Per section 1860D-2(d)(1)(B) of the Medicare Modernization Act and 42 CFR 423.100, the negotiated prices made available to Part D beneficiaries at the point of sale shall take into account negotiated price concessions for covered Part D drugs such as discounts and rebates which the Part D sponsor has elected to pass through to their enrollees at the point of sale, as well as any applicable dispensing fees. To ensure that the Prescription Drug Event (PDE) record accurately reflects the gross drug costs used to administer the prescription drug benefit, CMS added a new field to the PDE record for contract year 2008. Beginning in contract year 2008, Part D sponsors, who elect to pass estimated rebates through to their Part D enrollees at the point of sale, were required to report these estimated rebates in a new field, “Estimated Rebate at POS”. The addition of this field to the PDE record helps to ensure that the estimated rebates applied to the point of sale price are used appropriately to reduce the negotiated price, plan liability, and beneficiary cost sharing.</p> <p><u>Vaccine Administration:</u> This field was added to capture information related to administration of a Part D Vaccine as required by The Tax Relief and Health Care Act of 2006 (TRHCA).</p> <p><u>Prescription Origin Code:</u> In order to monitor the uptake of e-prescribing in the Part D program, CMS will require Part D sponsors to obtain the Prescription Origin Code via the NCPDP Telecommunication Standard 5.1 (see section 50.3 of Chapter 7 of the Prescription Drug Benefit Manual for more information on the standards for e-prescribing) option field 419 DJ beginning in 2010 and report this code on their prescription drug event (PDE) submissions. A corresponding Prescription Origin Code was added to the PDE record file layout and PDE return file layout at field number 41. Field 41 is optional for 2009. Based upon industry comment, we now plan to require the Prescription Origin Code (using alphanumeric values 1 – 4) only on</p>

	<p>PDEs for new prescriptions submitted in Standard format (currently Standard format is NCPDP Telecommunication Standard 5.1). The Prescription Origin Code will remain optional for all PDEs for refills submitted in the Standard format and for all PDEs submitted in the Non-Standard Format. Further, the Part D sponsor has the option to report “blank” for PDEs for refills and Non-Standard format PDEs.</p>
Burden Estimate	<p>The burden estimate was updated to reflect actual numbers from 3.5 years of program experience. The burden estimate is now more accurate and has further reduced burden by approximately 40% from the original estimate. Key drivers in the burden reduction are number of respondents, number of Medicare beneficiaries enrolled in part D, average number of PDEs per year, and average number of PDEs per beneficiary.</p>