

Revisions to Appendices for Pharmacy Benefit Manager Transparency for Qualified Health Plans
(CMS-10725/OMB control number: 0938-NEW)

Issue	Appendix	Appendix Page Number	Reason for the change and accompanying worksheets	Burden Effect
1	A, B	1	Appendix A for the 60 day PRA Notice was an Excel worksheet with two tabs for collecting summary-level data and detailed-level data, respectively. We removed the summary-level data tab from the Excel spreadsheet, and will require submission of the data via web form instead. The mockup for the web form is new Appendix A. The Excel Worksheet that was formerly Appendix A is now Appendix B and only contains one tab for detailed-level data.	None.
2	A, B, C, D	1	Separating the two tabs in the Excel spreadsheet that was former Appendix A created an additional Appendix that required relettering the other Appendices. Former Appendix A is now Appendix B. The instructions document which was former Appendix B is now Appendix C. The PBM attestation which was former Appendix C is now Appendix D.	None.
3	A	1	The field for bona fide services fees was removed from the summary-level data fields because there is no statutory authorization to collect such data.	The removal of one summary level field will have a negligible impact on lowering burden.
4	C	1	Added introduction and instructions for submitters to submit Appendices A, B, D, and E, which were not included in the 60 day notice. Submitters need this instruction in order to report data properly.	None.
5	C	2-6	Added sample allocation methodologies to account for differences in how data is currently held by submitters.	None.

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6	E	1	Added an attestation for QHP issuers to fill out to attest to the data's accuracy, completeness, and truthfulness when the QHP does not contract with a PBM to administer their prescription drug benefit.	None. There is no QHP issuer that does not contract with a PBM. We have made this attestation available for any instance in which a QHP issuer does not contract with a PBM and must report the data themselves.
7	A, C	A1, C8	Changed from plan year reporting to calendar year reporting to simplify collection. Requiring plan year reporting may have small group QHPs or their PBMs submitting data for a plan year which ended many months after the calendar year. Requiring all plans to submit on a calendar year basis will standardize when all data will be submitted.	None.