

Crosswalk

Old version	New Version	Type of Change	Reason for change	Burden Change
Old verbiage: Compliance for prescriptions in long-term care settings begins in CY 2025.	Updated verbiage: Compliance for prescriptions in long-term care settings begins in CY 2028.	Rev	Change in rule to give long term care prescribing more time to update their systems to match the requirement of a new e-prescribing standard.	No
We estimated only 100 waiver applications per year, due to that it was a new portal application and new PRA package, and we had no prior number to base the estimate on.	Updated the volume of waiver applications based on first year collection: we received a total of 278 waivers applications, and we will use the assumption of a 10% increase per year for a total of 306 waivers for this calculation.	Rev	Revised based on OMB instruction to “ <i>monitor the number/volume of the waiver applications</i> ”. Updated the volume of waiver applications based on first year collection. We expect to see an increase in the number of waiver applications based on the numbers from the previous year as well as factoring in a 10% increase.	No burden change to the individual persons filling out their waiver applications.

Type of Change: Rev = Revision, Del = Deletion, Add = Addition, and Red = Redesignation

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In the waiver application, for categories of circumstances beyond control that prevented the prescriber from meeting the compliance, there were 3 check box categories: 1) Economic Hardship 2) Technological Limitation and 3) Others.	In the newer version, the 1) Economic Hardship is changed to 1) Software Limitations. We also added a new category of 3) Local disaster or emergency. And the category "Others" become the 4) th category.	Rev	Revised based on OMB instruction that <i>"CMS monitors the number and types of waiver applications. Based on the volume and merits of the waiver application, revise... and/or information collected the waiver application."</i> We reviewed the waiver applications received in the first year and revised the categories of circumstances collected in the waiver application.	Reduced the burden for waiver applicants some verbiage on describing the general category of their circumstances.
No instruction or criteria for the waiver application in the previous version.	Added instructions and criteria for application that are 1) the colored box tables summarizing prescriber compliance status 2) verbiage around the colored box tables that only the non-compliant can apply for the waiver.	Rev	Revised based on OMB instruction during previous approval to <i>"...revise the instructions, criteria for application, and/or..."</i> . We added instructions and the criteria for application using the colored box tables and the associated verbiage instructions.	Reduced burden by showing prescriber compliance status in concise table and clarifying that those compliant do not need to submit waiver applications.

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Only one NPI (National Provider Identifier) can be checked per time for compliance status and for submitting a waiver application.	Revised to multi-NPI check feature that can check single as well as multiple NPIs' compliance statuses and submitting multiple waiver applications per time.	Rev	Prescriber staff and organization staff feedback on the burden for checking multiple prescribers' statuses when only one NPI can be checked for compliance status per time and one waiver application can be submitted per time.	Reduced the burden for the administrative staff by implementing a multiple-NPI check feature that would check multiple prescribers' compliances and apply for multiple waivers in one go

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