

DEPARTMENT OF HEALTH & HUMAN
SERVICES
Centers for Medicare & Medicaid Services
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CENTER FOR MEDICARE

DATE: March 3, 2023
TO: All Part D Sponsors
FROM: Jennifer R. Shapiro, Director, Medicare Plan Payment Group
SUBJECT: Other TrOOP Amount Indicator Summary Report

Section 1860D-15(h) of the Social Security Act (the Act), as added by section 11401(c) of the Inflation Reduction Act (IRA) and amended by section 11406(c) of the IRA, requires that a temporary retrospective subsidy be paid to Part D plans for the reduction in cost sharing and elimination of the deductible for Advisory Committee on Immunization Practices (ACIP)-recommended adult vaccines and covered insulin products during the 2023 plan year. This temporary retroactive subsidy is hereafter referred to as the Inflation Reduction Act Subsidy Amount, or IRASA. CMS issued program guidance on the calculation and reporting of IRASA via the Health Plan Management System (HPMS) memorandum dated September 26, 2022 titled “PDE Reporting Instructions for Implementing the Cost Sharing Maximums Established by the Inflation Reduction Act for Covered Insulin Products and ACIP-Recommended Vaccines for Contract Year 2023.” As described in that memorandum, the dollar value of IRASA must be reported in the Other TrOOP Amount field on the PDE record and the Other TrOOP Amount Indicator field must be populated as follows:

- Blank - the Other TrOOP Amount field is either blank or contains an only non-IRASA Other TrOOP amount;
- “S” – the Other TrOOP Amount field contains an only IRASA Other TrOOP amount; or
- “B” – the Other TrOOP field contains both IRASA Other TrOOP and non-IRASA Other TrOOP amounts.

In order to assist Part D sponsors in preparing for reconciliation of the IRASA, CMS is announcing a new monthly management report for Part D sponsors titled, “Other TrOOP Amount Indicator Summary Report.” This report provides a year-to-date cumulative record of

PDE records where the Other TrOOP Amount Indicator equals either “B” or “S”, which indicates that the Other TrOOP Amount on the PDE contains IRASA, either in part (“B”), or in whole (“S”). The PDE data contained in this report will be for dates of service in 2023 because IRASA only applies in 2023.

All plans that have submitted PDE records with DOS in 2023 will receive this report. If there have been no PDE records with the Other TrOOP Amount Indicator equal to “B” or “S,” there will be no DET records on this report and the PTR and CTR will reflect zeros in the PDE counts and sums.

The monthly Other TrOOP Amount Indicator Summary Report from CMS to Part D sponsors is different from the one-time IRASA reconciliation file that each Part D sponsor will send to CMS as a part of the data collection for 2023 Part D Payment Reconciliation. The requirements for this one-time reconciliation file will be described in a separate memorandum issued in the spring of 2024.

Report Delivery Schedule:

The Other TrOOP Amount Indicator Summary Report will be distributed monthly to Part D sponsors from Drug Data Processing System (DDPS) in the same way that other DDPS management reports (such as the Cumulative Beneficiary Summary Report) are currently distributed. The report naming convention for GENTRAN/TIBCO MFT will be: PROD.RPT.OTH_TROOP_RPT.#####, and the naming convention for SFTP will be: <Submitter ID>.CCYYMMDD.THHMMSS.nnnnnn.s.DDPS_OTH_TROOP_RPT.RPT. Sponsors should expect the first report to be distributed with the March 2023 month-end reports. The report will be delivered on a monthly basis until DDPS is closed to PDE record submissions for benefit year 2023.

File Format:

The Other TrOOP Amount Indicator Summary Report is in a flat file format. Header records identify the report. The contract header record (CHD) identifies the contract and is followed by a Plan Benefit Package (PBP) header (PHD), which identifies the contract/PBP. The PBP trailer record (PTR) and the contract trailer record (CTR) provide important summary counts and dollar amounts at the contract/PBP and contract level respectively.

The PTR record reports the count of final action non-delete PDE records where the Other TrOOP Amount Indicator equals “S”, the count of final action non-delete PDE records where the Other TrOOP Amount Indicator equals “B”, and the Other TrOOP Amount totals for both categories, summarized at the contract/PBP level. The CTR record has the same layout as the PTR record,

but with filler space in place of the PBP number, and reports the same data summarized at the contract level.

The detail (DET) records, found between the header and trailer records, provide the PDE-level information for all final action non-delete PDE records where the Other TrOOP Amount Indicator equals either “B” or “S”, sorted by the Medicare Beneficiary Identifier (MBI), Other TrOOP Amount Indicator, Date of Service (DOS), Service Provider ID Qualifier, Service Provider ID, Prescription Service Reference Number and Fill Number.

The Other TrOOP Amount Indicator Summary Report file format is included as an attachment to this memorandum and is also posted on the CSSC Operations website.

Please direct questions regarding this memo to PDE-Operations@cms.hhs.gov.

Thank you.