

**Medicare Transaction Facilitator for 2026 and 2027 under Sections 11001 and 11002 of the Inflation Reduction Act (IRA)  
(CMS-10912, OMB 0938-NEW) Crosswalk of Changes Between 30-Day and Final Documents\***

Location of Edits	Summary of Changes (Included for Final Publication)	Type of Change	Explanation of Changes	Burden Change (Yes/No)
Supporting Statement: Background	<ul style="list-style-type: none"> <li>Added the general categories of data elements included this ICR necessary for the implementation of MTF DM and MTF PM</li> </ul>	Modify	Revisions made to provide clarification on categories of data included in the collection.	No
Supporting Statement: Outside Consultation and Burden Estimates	<ul style="list-style-type: none"> <li>Included summary of revisions to each appendix based on public comment</li> </ul>	Modify	Revisions made to appendices in response to external comments	No
Appendix A: Introduction	<ul style="list-style-type: none"> <li>Updated link to final rulemaking where CMS finalized a requirement for Part D plan sponsors to include in their pharmacy agreements provisions requiring dispensing entities to be enrolled in the MTF DM</li> </ul>	Technical	Revision made to prevent readers from going to the proposed rule	No
Appendix A: Section 1 of Parts 1, 2 of the Dispensing Entity and Third-Party Support Entity Enrollment Form	<ul style="list-style-type: none"> <li>Revised instructions to state that users should review the table displaying all individuals within the enrolling entity assigned a user role</li> <li>Updated response formats to reflect that users' name, email address will be displayed for their review</li> </ul>	Technical	Revisions made to streamline and reflect latest user management procedures	Yes (burden reduction)
Appendix A: Section 2 of Parts 1, 2 of the Dispensing Entity and Third-Party Support Entity Enrollment Form	<ul style="list-style-type: none"> <li>Revised instructions in Part 1, section 2, question 1A and Part 2, section 2, question 2 to provide that the information may be prepopulated for the enrolling entity with information from their user management process</li> <li>Removed "NCPDP Parent Organization ID" and "NCPDP Chain Relationship ID" from the roster/table and made "State License Number" optional in the same roster/table under Part 1, section 2, question 2</li> </ul>	Technical	Revisions made to streamline and reflect latest user management procedures	Yes (burden reduction)

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Appendix A: Section 3 of Part 1 of the Dispensing Entity and Third-Party Support Entity Enrollment Form	<ul style="list-style-type: none"> <li>Revised response format for question 1 to dropdown menu containing a list of third-party support entities in NCPDP dataQ for dispensing entity to select from</li> <li>Added two fields under question 1D, requesting dispensing entity's federal Tax Identification Number (TIN) and National Provider Identifier (NPI) instructions for payment purposes</li> </ul>	Technical	Revisions made to streamline and reflect latest NCPDP integration and payment facilitation procedures	Yes (burden reduction)
Appendix A: Section 4 of Part 1 of the Dispensing Entity and Third-Party Support Entity Enrollment Form	<ul style="list-style-type: none"> <li>Added two fields under question 2, requesting dispensing entity provide, if applicable, their third-party support entity's NCPDP "Payment Center ID" code and "Remit and Reconciliation ID" code for verification purposes</li> </ul>	Technical	Revisions made to validate third-party support entity's identity and relationship with dispensing entity	No
Appendix A: Section 6 of Parts 1, 2 of the Dispensing Entity and Third-Party Support Entity Enrollment Form	<ul style="list-style-type: none"> <li>Removed field requesting "Name of Person Responsible for Submission" and updated "Signature" field to "Full Name (e-Signature)"</li> </ul>	Technical	Revisions made to streamline and reflect latest signature processes in the user interface	Yes (burden reduction)
Appendix A: Section 3 of Part 2 of the Dispensing Entity and Third-Party Support Entity Enrollment Form	<ul style="list-style-type: none"> <li>Added clarifying instructions that section 3 (Third-Party Support Entity Financial Information) is not required for entities that are only receiving/managing remittance advice on behalf of a dispensing entity</li> </ul>	Technical	Revisions made for clarity	No
Appendix B: Introduction	<ul style="list-style-type: none"> <li>Added language regarding agency's plan to redact and share the MFP effectuation plan with dispensing entities and, potentially, other stakeholders</li> </ul>	Modify	Revisions made in response to external comments	No
Appendix B: General Layout	<ul style="list-style-type: none"> <li>Sections 2 and 4 were reorganized, along with all associated question numbers</li> </ul>	Modify	Clarifications based on comments received and to align with emerging MTF DM system functionality	No
Appendix B: General Instructions Overview	<ul style="list-style-type: none"> <li>Updated outline depicting the organization of the form's sections</li> </ul>	Modify	Clarifications based on comments received and to align with emerging MTF DM system functionality	No

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Appendix B: General Instructions Submission Method	<ul style="list-style-type: none"> <li>Explanation added about which fields will be an electronic response and which will be a part of the editable PDF uploaded by manufacturers</li> </ul>	Modify	Clarifications based on comments received and to align with emerging MTF DM system functionality	No
Appendix B: Section 1 Former Questions 1 and 2	<ul style="list-style-type: none"> <li>Entire section replaced and questions deleted</li> </ul>	Modify	Clarifications based on comments received and to align with emerging MTF DM system functionality	Yes (burden reduction)
Appendix B: Section 1 Former Questions 19 and 20	<ul style="list-style-type: none"> <li>Questions moved to form a new Section 1</li> </ul>	Modify	Reorganization to align with emerging MTF DM system	No
Appendix B: Section 1 Introduction	<ul style="list-style-type: none"> <li>Added language explaining the approach to protecting proprietary information provided within the Form</li> </ul>	Modify	Clarification based upon external comments	No
Appendix B: Section 1, Question 2B	<ul style="list-style-type: none"> <li>Clarified that account type must be either checking or savings</li> <li>Added field requesting Primary Manufacturer's Federal Tax Identification Number (TIN) to aid in payment facilitation</li> </ul>	Modify	Technical changes	No
Appendix B: Section 2 Introduction	<ul style="list-style-type: none"> <li>Added language explaining the redactions that will be made to information entered in this section before the MFP Effectuation Plans are disclosed</li> <li>Added language explaining that this section will begin the fillable PDF that will be uploaded into the MTF DM</li> </ul>	Modify	Clarification based upon comments received and new system requirements from the MTF DM	No
Appendix B: Section 4 Question 8	<ul style="list-style-type: none"> <li>Added language explaining that the refund calculation approach is only applicable to Primary Manufacturers using retroactive reimbursement to effectuate the MFP</li> <li>Added numbering and separated the options a Primary Manufacturer can choose when responding to this question</li> </ul>	Modify	Revisions made in response to external comments	No
Appendix B: Section 4 Question 12	<ul style="list-style-type: none"> <li>Removed requirement that Primary Manufacturers list, or upload, the NPIs of dispensing entities with which a Primary Manufacturer has an alternative arrangement</li> </ul>	Modify	Revisions made in response to external comments	Yes (burden reduction)
Appendix B: Section 4 Question 13	<ul style="list-style-type: none"> <li>Added language informing Primary Manufacturer that CMS may still request NPI information no longer requested in Question 10</li> </ul>	Modify	Revisions made in response to external comments	No
Appendix B: Section 4 Question 14	<ul style="list-style-type: none"> <li>Added language clarifying when a response is required to this question</li> </ul>	Modify	Revisions made in response to external comments	No

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Appendix B: Section 4 Question 15	<ul style="list-style-type: none"> <li>Added language clarifying that acknowledgement is required</li> </ul>	Modify	Revisions made in response to external comments	No
Appendix B: Section 4 Questions 16 – 20 Instructions	<ul style="list-style-type: none"> <li>Added language regarding Secondary Manufacturer relationships</li> </ul>	Modify	Revisions made in response to external comments	No
Appendix B: Section 3 Introduction	<ul style="list-style-type: none"> <li>Added language explaining the redactions that will be made to information entered in this section before the MFP Effectuation Plans are disclosed</li> <li>Added language clarifying when a Primary Manufacturer must complete this section</li> </ul>	Modify	Revisions made in response to external comments	No
Appendix B: Section 2 (Former Section 4) Introduction	<ul style="list-style-type: none"> <li>Added language explaining the redactions that will be made to information entered in this section before the MFP effectuation Plans are disclosed</li> <li>Added language clarifying that CMS will provide a Primary Manufacturer with a list of dispensing entities that have self-identified as having material cashflow concerns</li> </ul>	Modify	Revisions made in response to external comments	No
Appendix B: Section 2 Question 4A	<ul style="list-style-type: none"> <li>Question deleted</li> </ul>	Modify	Revisions made in response to external comments	Yes (burden reduction)
Appendix B: Section 5 Introduction	<ul style="list-style-type: none"> <li>Added language explaining the redactions that will be made to information entered in this section before the MFP Effectuation Plans are disclosed</li> </ul>	Modify	Revisions made in response to external comments	No
Appendix B: Section 5 Question 23	<ul style="list-style-type: none"> <li>Changed “previous” to “newly submitted” for clarity and consistency</li> </ul>	Modify	Clarification based upon MTF system requirements and for consistency with the rest of the paragraph	No
Appendix B: Section 6 Introduction	<ul style="list-style-type: none"> <li>Added language explaining the redactions that will be made to information entered in this section before the MFP Effectuation Plans are disclosed</li> </ul>	Modify	Revisions made in response to external comments	No
Appendix B: Section 6 Former Question 27 (now 25)	<ul style="list-style-type: none"> <li>Changed language to conform with MTF DM system terminology</li> </ul>	Modify	Clarification based upon MTF DM system requirements	No
Appendix B: Section 2, Question 3	<ul style="list-style-type: none"> <li>Added additional language clarifying the types of communication methods a Primary Manufacturer should have available to dispensing entities</li> </ul>	Modify	Clarification to streamline data collection based on comments	No

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Appendix B: Section 2, Question 4	<ul style="list-style-type: none"> <li>Combined Questions 4A and 4B into a single question that captures the necessary data</li> </ul>	Modify	Revision made to streamline data collection based on comments	Yes (burden reduction)
Appendix B: Section 3, Question 5	<ul style="list-style-type: none"> <li>Removed Questions 5A, 5C, 5D, 5E, 5F, and 5J</li> <li>Changed Questions 5G and 5H from text response to acknowledgement check boxes</li> </ul>	Modify	Revision made to streamline data collection based on comments	Yes (burden reduction)
Appendix B: Section 4, Question 10	<ul style="list-style-type: none"> <li>Changed from a text response to acknowledgement check box</li> </ul>	Modify	Revision made to streamline data collection based on comments	Yes (burden reduction)
Appendix B: Section 4, Question 14	<ul style="list-style-type: none"> <li>Deleted Question 14 and added language to question 13 to make a comprehensive single question</li> </ul>	Modify	Revision made to streamline data collection based on comments	Yes (burden reduction)
Appendix B: Section 4, Question 16 (formerly Question 17)	<ul style="list-style-type: none"> <li>Added examples of processes and procedures that a Primary Manufacturer may want to include in its plan for corresponding with Secondary Manufacturers</li> </ul>	Modify	Clarification of the type of information CMS is interested in reviewing based on comments	No
Appendix B: Section 4, Question 18	<ul style="list-style-type: none"> <li>Deleted</li> </ul>	Modify	Revision made to streamline data collection based on comments	Yes (burden reduction)
Appendix B: Section 4, Question 19	<ul style="list-style-type: none"> <li>Deleted</li> </ul>	Modify	Revision made to streamline data collection based on comments	Yes (burden reduction)
Appendix B: Section 4, Question 20	<ul style="list-style-type: none"> <li>Deleted</li> </ul>	Modify	Revision made to streamline data collection based on comments	Yes (burden reduction)
Appendix C: Overall	<ul style="list-style-type: none"> <li>Renumbered Payment Elements due to deletion of payment element</li> </ul>	Modify	Revisions made to align with draft guidance	No
Appendix C: Section 1 Payment Element 4	<ul style="list-style-type: none"> <li>Deleted payment element “Quantity of Selected Drug” to reflect removal of this payment element from draft guidance due to duplication with information on claim-level data elements</li> </ul>	Modify	Revision made to align with guidance	No

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Appendix C: Section 1 Payment Element 6	<ul style="list-style-type: none"> <li>Renumbered as Payment Element 5</li> <li>Deleted “MFP Refund Adjustment” as a payment element to reflect draft guidance</li> <li>Replaced with “Transaction Code” to reflect this payment element from draft guidance</li> </ul>	Modify	Revisions made to align with draft guidance	No
Appendix D	<ul style="list-style-type: none"> <li>Updated to include the dispensing entity’s NPI as an optional field</li> </ul>	Modify	Revision made in response to external comments	No
Appendix D	<ul style="list-style-type: none"> <li>Updated the requirement related to providing translated versions of any submitted materials to only include the name and contact information of the individual who performed the translation.</li> </ul>	Modify	Revision made to reduce burden	Yes (Burden reduction)

\*Question numbering matches final document