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**CENTERS FOR MEDICARE & MEDICAID SERVICES**

**CY 2019 OUT-OF-POCKET COST MODEL**

**USER GUIDE**

**APRIL 2018**

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## Introduction

The Out-of-Pocket Cost (OOPC) Model is a set of programs used to calculate the estimated out-of-pocket costs for a given set of beneficiaries in order to determine the value of the benefits being offered by a Plan Benefit Package (PBP). The purpose of the User Guide is to provide Medicare Advantage Organizations (MAOs), Prescription Drug Plan (PDP) Sponsors, and section 1876 Cost Plans with the technical information required to generate OOPC values while preparing CY 2019 bid submissions to comply with Centers for Medicare & Medicaid Services (CMS) requirements. Stand-alone PDPs and MAOs are encouraged to run their plan benefit structures through the SAS OOPC model to ensure that their plan offerings comply with the following regulatory requirements addressed in the Announcement of Calendar Year (CY) 2019 Medicare Advantage Capitation Rates and Medicare Advantage and Part D Payment Policies and Final Call Letter. Section 1876 Cost Plans use this model to prepare bids that satisfy CMS requirements for cost contract plan transition requirements.

Questions can be directed as follows:

For technical questions about the OOPC model, please submit an email to [OOPC@cms.hhs.gov](mailto:OOPC@cms.hhs.gov)

For Part C policy related questions about Total Beneficiary Cost (TBC), please contact <https://mabenefitsmailbox.lmi.org/>

For Part D policy related questions about meaningful difference, please submit an email to [partdbenefits@cms.hhs.gov](mailto:partdbenefits@cms.hhs.gov)

For Section 1876 Cost Plan transition policy related questions, please contact <https://dpap.lmi.org/>

For Bid Pricing Tool (BPT) questions, please submit questions to [actuarial-bids@cms.hhs.gov](mailto:actuarial-bids@cms.hhs.gov)

The OOPC Model is designed to allow plan organizations to run their submitted benefit structures through the software code and data used by CMS to evaluate annual bid submissions. The software is a modified version of the code used to provide the estimated out-of-pocket costs produced for the Medicare Plan Finder published on the Medicare.gov website. The Medicare Plan Finder provides OOPC values for MAO, PDP, Original Medicare, and Medigap plans according to the self-reported health status of beneficiaries. In contrast, the OOPC Model reports OOPC values by PBP-based service category at the plan level. The section **Development of the Out-of-Pocket Cost (OOPC) Data** summarizes CMS's process to produce the OOPC values. MAOs and PDP Sponsors are encouraged to review the more comprehensive "CMS CY 2019 Out-of-Pocket Cost Model Methodology April 2018" document located in the OOPC Model package and at

<https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovGenIn/OOPCResources.html>

The current version of the Model uses the same beneficiary utilization data as was used for the CY 2018 Plan Finder values. Organizations apply their own 2019 PBP and formulary data to the software. After the user has successfully input their data for a

particular contract/plan, and exit/validated the PBP (a given organization may have multiple plans for a given contract), then the data are ready for use in the Model. Users download the OOPC Model and follow the directions for where to copy the SAS programs and SAS data that serve as the other inputs. The user edits several small SAS programs and then executes them.

The OOPC Model package (**OOPC2019PLANV1.ZIP**) consists of a set of provided input datasets (SAS transport format) and a series of SAS programs. The programs import PBP, formulary, and utilization data. The SAS programs calculate person-plan-level costs for each service category and for part D benefits, and summarize the costs to the plan level, and output to a plan-level Excel file.

The Model produces OOPC values for Part C and Part D services by utilizing their completed PBP and drug formulary data. This User Guide describes the contents of the OOPC software package, provides specific instructions on how to calculate OOPC values for the PBP service categories, and explains how to generate output values in the form of an Excel workbook.

**Note:** For CY 2019, benefits and the reduction in cost sharing that are offered as part of the Value-Based Insurance Design (VBID) model test or Uniformity Flexibility will not be included in the TBC evaluation.

## Resource Requirements

Operation of the Model requires that the user be familiar with PC file management and operating SAS software.

**Model Requirements:** The Model has been tested on a variety of PCs. The user will need WINZIP to unzip the OOPC model package and storage space to accommodate the downloadable files that total over 100 MB (4 MB zipped). A version of PC SAS with SAS/ACCESS Interface to PC Files installed will be required. The Model was developed and tested using SAS Version 9.4 on 64-bit machines using Windows Office 13. Microsoft Excel is required for generating and using the Model output. Testing has been done using 2013 and 2016 versions of Excel and Access.

**Processing Time:** The processing of the data to generate the OOPC values is inherently time-consuming, but efforts have been made to make the model run as efficiently as possible. The programs that import the various input files will run quickly. However, as described in the **Development of the Out-of-Pocket Cost (OOPC) Data** section, the claims data for several thousand MCBS respondents must be applied to the cost-sharing structure for each service category. Also, features such as deductibles and plan maximums must be applied and the costs adjusted. This process is expanded whenever values are produced for multiple plans. The Part D calculations involve many different variables and combinations of covered/non-covered drugs, pricing structures, and formularies. Running a single or a few plans at a time will shorten the run time, especially when fewer drug formularies are involved.

## Input Datasets Included in the Software Package

### Utilization Data Provided by CMS

The software includes two primary SAS transport datasets for Part C calculations. The person-level (**PERSON.XPT**) file contains information on the cohort of beneficiaries in the 2012/2013 MCBS survey. The **UTILIZATION.XPT** file contains information on this cohort's 2012 and 2013 Medicare utilization as reported by the MCBS survey. These are used after they are converted to SAS datasets with a SAS program included in the package (**CIMPORT.SAS**). The software also includes other SAS transport datasets for the Part D calculations. The **BENE\_SCRIPT.XPT** file lists the drug names and scripts for each beneficiary in the MCBS drug file. The **DRUGLIST\_RXCUI.XPT** file lists all the MCBS drug names that are used in the OOPC model, along with their associated RXCUIs, Brand/Generic status, and average prices. The **CIMPORT.SAS** program converts these SAS transport files into SAS datasets.

*Note:* The DRUGLIST\_RXCUI file used as input in the model has been created using the Formulary Reference File, Medispan/FDB files, Generic Substitutes files, Brand/Generic drug description files available in March 2018. It is not updated during the bid winnowing process. This file is updated from the DRUGLIST\_RXCUI file that produced the OOPC estimates for the 2018 Plan Finder that were posted on HPMS in December 2017. The Plan Finder version of the DRUGLIST file was created using FRF and related files available in July 2017. As a result, Part D OOPC results using identical PBP and formulary input may be different when running the April 2018 version of the model compared with the 2018 Plan Finder version.

## Input Datasets Provided by the User

### Plan List

Each user will provide a text file list of the plans to be used for each calculation of OOPC values. This file (**PLANFILE.TXT**) will consist of a combined Contract/Plan/Segment identifier. For example, Contract Plan Segment: H9999 001 001 will appear as H9999001001. PDP plan S9999 001 will appear as S9999001000.

### *Planfile.txt Record Layout*

**Required File Format = ASCII File - Tab Delimited**  
**Do not include a header record**  
**Filename extension should be “.TXT”**

Field Name	Field Type	Field Length	Field Description	Sample Field Value(s)
Contract_Plan_Segment	CHAR	11	Unique Contract/Plan/Segment identifier	H9999001000

Parts of an example file look like:

H9999001000  
H9998002000  
H9997003000  
H9996001001  
S9999001000  
S9998001000  
S9997002000

**Note:** Only plans in the plan list will be run in the OOPC calculation, even if more plans exist in a user's PBP database.

## **PBP Data**

Each year, plan personnel and other users are required to enter their benefit data into the Plan Benefit Package (PBP) software in order to submit a bid. Plans are provided with instructions each year on how to enter data into the PBP software. We provide an overview of how plan data are collected and input into the tool below.

**Background of the PBP/Bid Process:** Organizations first complete or update the Plan Creation Module of HPMS to establish the plans available under each contract. The CY 2019 version of the PBP software is available in HPMS as of April 2018. Detailed instructions are provided to the plans on how to obtain the software and then how to perform the necessary data entry and bid process. CMS provides instructions on the HPMS and training via other methods.

The software is installed on a user's local PC (or on a network). Documentation (e.g., the Bid Manual) is provided to guide the user. The PBP software has exit/validation rules to ensure that the bid will meet certain specifications. Shortly after the PBP software becomes available, plans may begin submitting their bid(s) to CMS by uploading the PBP databases. Bids are rejected or accepted. Plans have several weeks before their final bid (upload) is due to CMS.

**PBP Data Input to OOPC Tool:** As part of this bid submission process, the PBP data is automatically stored in a database. Once a database has been created using the PBP system, a SAS program in the OOPC Model will read a plan's PBP data from the Access database and convert it to a SAS file.

The PBP-created databases that are needed as input to the Model are **PBP2019.MDB** and **PBPPLANS2019.MDB**. The OOPC Model needs to point to the location of the two databases.

**Note:** The OOPC Model should point to the databases associated with the PBP Super User. If there are other PBP data entry users, the Super User should ensure that they have received the most up-to-date data entry before running the OOPC Model.

## Drug Formulary Data

For producing the Part D OOPC values, plan organizations with Part D benefits (PDPs and MA-PDs) will produce four files that describe the plan's formulary.

The first file, **FORMULARY.TXT**, needs to contain a tab-delimited list of the drugs for each formulary of the plans to be included in an OOPC calculation. This and other .txt files described below should not contain header, or label rows, and should keep any leading zeroes. Each row in the file will contain, in this order: a formulary identifier, an RXCUI, and a Tier-level identifier (1-6). This information can be obtained from the plan organization's formulary.

### *Formulary.txt Record Layout*

**Required File Format = ASCII File - Tab Delimited**

**Do not include a header record**

**Filename extension should be ".TXT"**

Field Name	Field Type	Field Length	Field Description	Sample Field Value(s)
Formulary ID	CHAR	8	Unique Formulary Identifier	00019990
RXCUI	Number	Maximum of 8 digits	Rx Norm concept unique identifier from the active CY2019 Formulary Reference File	721775
Tier Level	CHAR	1	Defines the Cost Share Tier level associated with the drug	1 = Tier Level 1 2 = Tier Level 2 3 = Tier Level 3 4 = Tier Level 4 5 = Tier Level 5 6 = Tier Level 6

Parts of an example file look like:

```
00019990 721775      1
00019991 721793      1
00019992 721795      2
00019993 721797      3
00019994 722113      2
```

**Note:** The Formulary ID needs to have an 8 digit field length. Any entries greater or less than 8 digits will not be read or used by the model.

The second file, **GAP\_DRUGS.TXT** contains a tab-delimited list of all plans and drugs (RXCUIs) for each plan that has partial tier coverage. This information can be obtained from the plan organizations' supplemental formulary file submissions. The file will be submitted with a Contract identifier and a Plan identifier (no segment identifier required).

The third file, **FFF.TXT**, contains a tab-delimited list of all plans and drugs (RXCUIs) for each plan that offers Free First Fill coverage. This information can be obtained from the plan organizations' supplemental formulary file submissions. The file will be submitted with a Contract identifier and a Plan identifier (no segment identifier required).

**Note:** If a plan has no partial tier coverage or no Free First Fill drugs, a blank version (i.e., no rows) of the **GAP\_DRUGS.TXT** or the **FFF.TXT** file needs to be created and saved.

**Gap Drugs.txt/FFF.txt Record Layout**

**Required File Format = ASCII File - Tab Delimited**  
**Do not include a header record**  
**Filename extension should be “.TXT”**

Field Name	Field Type	Field Length	Field Description	Sample Field Value(s)
Contract ID	CHAR	5	Contract Number	H9999
Plan ID	CHAR	3	Plan Identifier	001
RXCUI	Number	Maximum of 8 digits	Rx Norm concept unique identifier from the active CY2019 Formulary Reference File	721775

Parts of an example file look like:

```
H9999    001    721775
H9999    001    721793
H9999    001    721795
S9999    001    721797
S9999    001    722113
```

The fourth file, **PLAN\_FORMULARY.TXT**, contains a tab-delimited list of all contract, plan, and formulary identifiers that are to be run. The list of plans needs to correspond exactly with the list of plans in the **PLANFILE.TXT** file described above, although only the contract plan and plan identifiers are required.

***Plan Formulary.txt Record Layout***

**Required File Format = ASCII File - Tab Delimited**

**Do not include a header record**

**Filename extension should be “.TXT”**

<b>Field Name</b>	<b>Field Type</b>	<b>Field Length</b>	<b>Field Description</b>	<b>Sample Field Value(s)</b>
Contract ID	CHAR	5	Contract Number	H9999
Plan ID	CHAR	3	Plan Identifier	001
Formulary ID	CHAR	8	Unique Formulary Identifier	00019990

Parts of an example file look like:

```
H9999      001      00019990
H9998      002      00019991
H9997      003      00019992
H9996      001      00019993
S9999      001      00019994
S9998      001      00019990
S9997      002      00019991
```

## Programs Included in the Software Package

The complete list of SAS Programs can be found in the Contents of the Zip File section below. The key programs that launch the computations are described below:

**CIMPORT.SAS** converts the SAS transport files supplied with this software into SAS datasets.

**PARTD\_FORM.SAS** takes the Part D related formulary files described above and converts them into SAS format.

**OOPCVIP.SAS** supplies user-defined parameters needed to run the OOPC Model and calls the other SAS programs that carry out the calculations.

## Instructions for Running the Model and Creating OOPC Values

Please read and follow the instructions carefully before running the software.

**Step 1:** Create a text file (**PLANFILE.TXT**) that lists the plans of interest. Make a note of the directory location of the file.

**Step 2:** Complete the PBP data entry for plans of interest using the PBP software. The resulting files will be named **PBP2019.MDB** and **PBPPLANS2019.MDB**. Make a note of the location of these files: e.g., c:\program files\PBP2019.

**Step 3:** Create text files for the formulary information of the plans to be run: **FORMULARY.TXT**, **PLAN\_FORMULARY.TXT**, **GAP\_DRUGS.TXT**, and **FFF.TXT** and copy them to a created formulary directory: e.g., c:\oopc\formulary. Make a note of the location of these files.

**Note:** If no plans have Part D benefits, you still need to create a formulary directory even if it contains no formulary text files.

**Step 4:** Set up directory locations for all files.

- a. Copy the file **OOPC2019PLANV1.ZIP** to a working directory (e.g., **c:\oopc**) and unzip its contents to that directory. At this point there will be a **programs.zip** and **input.zip** file.
- b. In the working directory, unzip the contents of **programs.zip** to create the **c:\oopc\programs** directory for the SAS programs modified by the user.
- c. In the working directory, unzip the contents of **input.zip** to create the **c:\oopc\input** directory for the input files and the programs that are not changed by the user.
- d. Set up a directory for the output spreadsheet file (e.g., **c:\oopc\output**)
- e. Copy the **PLANFILE.TXT** file to the newly created programs file directory. (e.g., **c:\oopc\program**).

**Step 5:** Edit the program **CIMPORT.SAS** as necessary so that the location (**in bold**) of the input data is specified for all of the .XPT files. The programs provided in the Model package contain, as defaults, the directory locations listed above. The user can change these locations, as desired.

```
* PROGRAM: CIMPORT.SAS;  
* DESCRIPTION: IMPORT THE INPUT FILES TO THE OOPC PROCESS;  
  
%LET DATALOC =  
%str(c:\oopc);
```

Then run **CIMPORT.SAS**.

For this and for subsequent SAS runs, check the SAS Log window to make sure the text string **ERROR** does not appear anywhere. (In the **Troubleshooting** section below are noted several sources of problems when setting up and running the programs).

**Note:** Once this step is done, the user does not need to redo this step for subsequent runs.

**Step 6:** Import **FORMULARY.TXT**, **PLAN\_FORMULARY.TXT**, **GAP\_DRUGS.TXT**, and **FFF.TXT** files by editing the provided **PARTD\_FORM.SAS** program, as necessary, for the correct directory locations and files.

**Note:** If no plans have Part D benefits, ignore this step.

```
*PROGRAM: PARTD_FORM.SAS;  
*DESCRIPTION: CREATES SAS FILES FOR FOUR TAB DELIMITED  
FILES;  
%LET DIR = C:\OOPC\formulary;  
%LET FORMFILE = FORMULARY.TXT;  
%LET PLANFORM = PLAN_FORMULARY.TXT;  
%LET GAPDRUGS = GAP_DRUGS.TXT;  
%LET FFFDRUGS = FFF.TXT;
```

Then run **PARTD\_FORM.SAS**.

**Note:** Once this step is finished, and if there is no change in the formulary data, the user does not need to redo this step for subsequent runs. If necessary, the user may create and use different formulary text files and rerun **PARTD\_FORM.SAS**.

**Step 7:** Edit the program **OOPCVIP.SAS** in the statements as shown below to indicate the directories (**in bold**) where the SAS programs and input files are stored. The programs provided in the Model package contain, as defaults, the directory locations listed above. Also, edit the program to indicate where the PBP data are stored. And finally, edit the program to identify the location and name of the output spreadsheet file. You can change the output spreadsheet name as necessary. For example, in the “**OOPC** =&OUTPUT.**OOPC\_RUN**&file\_date.” line, to identify the first run for a given day, change the default label “**OOPC\_RUN**” to “**OOPC\_RUN1\_.**” (The “&file\_date” function automatically outputs the date of the run.)

```

* PROGRAM: OOPCV1P.SAS;
* DESCRIPTION: MAIN OOPC PROGRAM;

%LET INPUTDIR =          c:\oopc\input;
%LET PROGDIR =           c:\oopc\programs;
%LET PBPDIR =            c:\program files\pbp2019;
%LET FORMDIR =           c:\oopc\formulary;
%LET PLANFILEDIR =       c:\oopc\programs;
%LET OUTPUT =            c:\oopc\output;

%OOPCV1M(RUNYEAR         =2019,
INP                      =IN1.PERSON,
INC                      =IN1.UTILIZATION,
CATEG                    =IN1.CATEGORY,
PBP                      =&PBPDIR,
FORMULARY                =&FORMDIR,
PLANFILE                 =&PLANFILEDIR\PLANFILE.TXT,
OOPC                     =&OUTPUT.OOPC_RUN&file_date.);

```

Then run **OOPCV1P.SAS**.

When checking the SAS Log window for the run, you can identify the run time by looking at the last few lines of a successful run. For example,

**NOTE: The SAS System used:**  
**real time**        **1:36.67**  
**cpu time**        **43.10 seconds**

The resulting Excel spreadsheet file (.xlsx) will exist in the designated output file directory when the program finishes running successfully. The category fields display the expected average monthly cost for the contract plan segment by PBP-based benefit category. **PartD** displays the Part D OOPC. **Total** displays the sum of the categories, excluding **PartD**. The **Grand Total** displays the sum of all categories, including Part D; PDP (S-Plans) will only display Part D OOPC values.

*Note:* A separate, calculated plan level deductible category allocation is not displayed. Plan deductible calculations are attributed proportionately and included in the individual category estimates. Also, a **PartD** estimate is displayed for MA plans that do not have a Part D benefit. This estimate is identical to the calculation used for Original Medicare beneficiaries who do not participate in the Part D program. Finally, displayed for reference is the PBP\_Version\_Date.

An example (truncated) of the resulting spreadsheet output is shown below (test data):

Plan_Name	Benefit_Y	Inpatient_Hospita	Emergency	Preventative_D	Comprehensiv	Total	PartD	Grand_Total	PBP_Version_Date
RFB MA-PD A/B Full Netw	2019	4.244027933	3.916401612	6.040953129	9.940837034	86.20157192	102.6265426	188.8281146	20MAR2018:11:35:06
RFB MA-PD A/B DS (HMO	2019	6.162398509	3.632222424	7.114611734	18.57516576	117.8907744	84.93040305	202.8211775	20MAR2018:11:40:52
1876 MA-Only A/B (Cost	2019	12.51641611	0	17.98967936	26.56737391	133.8410574	386.116	519.9570574	20MAR2018:11:26:04
RFB MA-PD A/B Partial N	2019	16.56194963	3.099462296	17.98967936	26.56737391	135.3974009	102.6265426	238.0239436	20MAR2018:11:46:42
MA-PD A/B SNP Chronic	2019	14.97660658	3.832830627	9.828265009	16.06624558	112.2693686	102.6265426	214.8959113	20MAR2018:11:51:11
MA-PD A/B Full Network	2019	8.656705865	3.859937421	6.035489254	9.907702754	101.9010606	84.93040305	186.8314637	20MAR2018:09:45:43
MA-Only A/B Full Netwo	2019	41.81124029	0	7.882211282	14.167806	100.0791292	354.5894657	454.6685949	20MAR2018:09:43:06
RFB MA-PD A/B DS (PPO)	2019	23.02364003	2.330114212	17.98967936	26.56737391	182.2859634	61.00852074	243.2944841	20MAR2018:10:05:10
MA-PD A/B EA (PPO)	2019	23.02364003	2.330114212	17.98967936	26.56737391	182.2859634	61.00852074	243.2944841	20MAR2018:11:54:12
RFB MA-PD A/B DS (HMO	2019	6.321306529	3.862996464	6.035829863	9.910277984	88.39136796	84.93040305	173.321771	20MAR2018:11:29:48
MA-PD A/B BA (Regional	2019	21.1036438	3.415515371	7.114611734	18.57516576	176.3256713	84.93040305	261.2560743	20MAR2018:11:10:15
PD-Only EA (PDP)	2019						84.93040305	84.93040305	20MAR2018:11:10:31

## Rerunning the Model

**Change Plan Benefits for a Plan:** To change the plan benefit assumptions, for the same plan(s) first modify the appropriate PBP data entry.

**Change Plans:** To change plans, modify the PBP data entry, change the PLANFILE.TXT and if necessary, the formulary .txt files.

**Change Formulary files/Same plan:** To change formulary assumptions for the same plan(s), change the formulary.txt files.

**For any of the above changes,** after changing input files, and rerunning as necessary, PARTD\_FORM.SAS, rerun OOPCVIP.SAS, while changing the Excel output file name.

## Contents of the Output (Excel) File

The output from the OOPC Model is a single excel file. The table below lists the labels as they appear in the output file and in the corresponding detailed heading.

**Note:** Labels used in the output file are restricted to no more than 32 characters by SAS.

Label Used in Output Files	Detailed Heading/Description
Contract_Number	Contract Number
Plan_ID	Plan ID
Segment_ID	Segment ID
Organization_Marketing_Name	Organization Marketing Name
Plan_Name	Plan Name
Benefit_Year	Benefit Year/PBP for Estimated OOPC Values
Inpatient_Hospital_Acute_Care	Inpatient Hospital Services including Acute OOPC Value
Inpatient_Mental_Health_Care	Inpatient Psychiatric Hospital Services OOPC
Skilled_Nursing_Facility	Skilled Nursing Facility OOPC Value
Cardiac_Rehabilitation_Services	Cardiac Rehabilitation Services OOPC Value
Pulmonary_Rehab_Services	Pulmonary Rehabilitation Services
Emergency_Care	Emergency Care OOPC Value

<b>Label Used in Output Files</b>	<b>Detailed Heading/Description</b>
Urgently_Needed_Care	Urgently Needed Care OOPC Value
Home_Health_Agency	Home Health Services OOPC Value
Primary_Care_Physician	Primary Care Physician Services OOPC Value
Chiropractic_Services	Chiropractic Services OOPC Value
Occupational_Therapy	Occupational Therapy Services OOPC Value
Physician_Specialists	Physician Specialist Services OOPC Value
Outpatient_Mental_Health_Care	Mental Health Specialty Services - Non-Physician OOPC Value
Podiatry_Services	Podiatry Services OOPC Value
Other_Health_Professionals	Other Health Care Professional Services OOPC Value
Psychiatric_Care	Psychiatric Services OOPC Value
Physical_and_Speech_Therapy	Physical Therapy and Speech-Language Pathology Services OOPC Value
Outpatient_Lab	Outpatient Lab Services OOPC Value
Diagnostic_Tests_and_Procedures	Outpatient Diag Tests/Procedures OOPC Value
Therapeutic_Radiation	Therapeutic Radiological Services OOPC Value
Outpatient_X_Rays	Outpatient X-Ray services OOPC Value
Diagnostic_Radiological_Services	Diagnostic Radiological services OOPC Value
Outpatient_Hospital_Services	Outpatient Hospital Services OOPC Value
Ambulatory_Surgical_Center	Ambulatory Surgical Center (ASC) Services OOPC Value
Chemotherapy_Drugs	Chemotherapy OOPC Value
Ambulance	Ambulance Services OOPC Value
Durable_Medical_Equipment	Durable Medical Equipment OOPC Value
Prosthetic_Devices	Prosthetics, Orthotics, and Other Medical Supplies OOPC Value
Renal_Dialysis	End-Stage Renal Disease OOPC Value
Diabetes_Education	Diabetes Education
Medicare_Covered_Part_B_Drugs	Medicare-Covered Part B Prescription Drugs OOPC Value
Preventive_Dental	Preventive Dental OOPC Value
Comprehensive_Dental	Comprehensive Dental OOPC Value
Eye_Exams	Eye Exams OOPC Value
Hearing_Exams	Hearing Exams OOPC Value
Total	Total Costs (Excluding Part D Drugs and including calculated plan deductible)
PartD	Part D OOPC Value
Grand_Total	Grand Total
PBP_Version_Date	PBP Version Date

## Contents of the ZIP File (OOPC2019PLANV1.zip)

### 1. Input.zip

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## **2. Programs.zip**

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## CY 2019 Changes to the Model

The version of the OOPC model described in this document is an update of the CY 2018 model delivered in April, 2017. For the 2019 OOPC model, the items listed below summarize the changes that have been made.

- Updated MCBS inflation and drug utilization factors provided by the Office of the Actuary (OACT). These factors inflate the 2012 and 2013 MCBS utilization cost data to CY 2018 levels. The April, 2017 model inflated 2011 and 2012 MCBS utilization data to CY 2017 levels.
- Updated the Medicare Part A and B deductibles, coinsurance, and premiums to 2018 values. OOPC estimates will be affected if plans apply cost sharing to any of these values.
- Updated the Part D policy parameters (deductible, initial coverage limit, gap coverage percentages, etc.) to 2019 values.
- Modified Coverage Gap Brand and Generic discount and subsidy factors to take into account changes for 2019, including the closure of the coverage gap for brand drugs to take place in 2019.
- Updated Prescription Drug Event (PDE) data for drug price calculation. (The CY 2019 OOPC Plan V1 uses 2017 PDE data.)
- Updated the Part D input data using March, 2018 updates of the FRF, cross-reference, generic substitution, Medispan-FDB, and ADSF (Applicable/Non-Applicable) files.
- Updated the code to take into account 2019 PBP data structure and variable name changes.
- Made corrections to the code, including the application of the catastrophic threshold amount.
- Updated the code to reflect collection of PBP cost sharing for ambulance by mode of transportation (Land or Air).
- Made revisions to the 2012/2013 MCBS dental data to take into account the lack of reported 2012 and 2013 individual category service data. For the 2019 OOPC model, dental service data is imputed, based upon historical dental service data. Also, the estimated allocation of total costs per dental visit between preventive and comprehensive services has been revised to better reflect the historical cost of individual services.

## Development of the Out-of-Pocket Cost (OOPC) Data

The OOPC Model was developed using the methodology summarized below. Medicare Advantage Organizations and Plan Sponsors are encouraged to review the more comprehensive “Centers for Medicare & Medicaid Services CY 2019 Out-of-Pocket Cost Model Methodology April 2018” document located at:

<https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovGenIn/OOPCResources.html>.

The Centers for Medicare & Medicaid Services (CMS) used the events or incidents of health care usage reported by individuals from the Medicare Current Beneficiary Survey (MCBS). The reported use of health care is matched to the individual claims history to make sure Medicare covered services are included, as well as services not covered by Medicare.

For the CY 2019 OOPC Model, two years (2012 and 2013) of MCBS data are combined to create statistically valid and reliable cost values. Combining the data for both years creates a nationally representative cohort of individuals with Medicare.

Individuals are excluded for certain reasons including if they did not participate in both Medicare Parts A & B for the full 12 months of the year or if they were in a long-term care facility for any part of the year. The focus is on individuals in Original Medicare so that both MCBS survey results and the Medicare claims data could be linked for the same period. Also excluded are certain categories of individuals whose claims are paid differently or for whom there is not a full complement of data.

Average monthly out-of-pocket costs are calculated for each health plan. CMS used historical Medicare claims data and survey data for non-Medicare-covered services to determine total health care utilization for each person with Medicare. Beneficiaries eligible for low income subsidies and cost sharing are not included in the OOPC calculations. As appropriate, costs for the various service categories were inflated from 2012/2013 to the plan year using inflation factors provided by CMS/OACT. Beneficiary utilization claims were mapped into appropriate PBP-based categories using diagnosis, procedure, and revenue center code information. CMS then applied the data entered into the Plan Benefit Packages (PBPs) to compute the out-of-pocket costs based on benefits covered and co-payments/coinsurance for each health care service. The beneficiary level OOPC values are then aggregated to plan level using the individual MCBS sample weights in order to yield nationally representative data. Annual values are enrollment-adjusted to yield mean monthly costs.

CMS made the following basic assumptions related to the out-of-pocket cost estimates for Medicare Advantage Plans:

- Use CY 2019 Plan Benefit Packages to define the out-of-pocket cost values.
- Use cost shares for in-network providers.
- Use minimum co-payments if stated as a minimum/maximum range.
- Use in-network deductibles and plan maximums, as applicable (please note that a combined in- and out-of-network deductible is for plans without the in-network deductible).
- Optional Supplemental benefits are not included.
- Costs for select Mandatory Supplemental benefits are included, based on

available MCBS data.

CMS made the following basic assumptions related to the out-of-pocket cost estimates for prescription drugs:

- MCBS drug events are mapped into RXCUI codes to apply a particular plan's tier-formulary based cost sharing. Use Prescription Drug Event (PDE) claims data (2017) for average drug prices. Relevant deductibles are also taken into account. A more complete description can be found under the **Part D OOPC** section.

The services included in the out-of-pocket cost calculations for Medicare Advantage Plans are listed below.

- Ambulance Services
- Ambulatory Surgical Center (ASC) Services
- Cardiac and Pulmonary Rehabilitation Services
- Medicare Part B Chemotherapy Drugs
- Chiropractic Services
- Preventive Dental
- Comprehensive Dental\*
- Diabetes Self-Management Training
- Outpatient Diagnostic Radiological services
- Durable Medical Equipment (DME)
- Emergency Care
- Dialysis Services
- Eye Exams
- Hearing Exams
- Home Health Services
- Inpatient Hospital Acute Services\*
- Inpatient Hospital Psychiatric Services\*
- Medicare Part B Prescription Drugs
- Mental Health Specialty Services
- Occupational Therapy Services
- Other Health Care Professional Services
- Outpatient Diagnostic Procedures/Tests
- Outpatient Hospital Services
- Outpatient Lab Services
- Outpatient X-Ray services
- PT and SP Services
- Physician Specialist Services
- Psychiatric Services
- Podiatry Services
- Primary Care Physician Services
- Prosthetics, Orthotics, and Other Medical Supplies
- Skilled Nursing Facility (SNF)\*

- Outpatient Therapeutic Radiological Services
- Urgently Needed Services
- Part D Prescription Drugs

An asterisk (\*) indicates that the calculation includes Medicare-covered services as well as supplemental services. Supplemental Services are defined as additional days and non-Medicare-covered stays for Inpatient Hospital Services (Acute and Psychiatric) and as additional days for SNF. Comprehensive dental includes Medicare-covered dental exam and supplemental dental.

Medicare Advantage plans offer a wide range of supplemental benefits, some of which were not included in the out-of-pocket costs calculations because MCBS claims data are insufficient or do not exist. Some examples of supplemental benefits not included in the out-of-pocket cost values for Medicare Advantage plans are:

- Worldwide Emergency/Urgent coverage outside the United States and its territories
- Transportation
- Acupuncture
- Hearing services not usually covered by Medicare
- Vision services not usually covered by Medicare
- Chiropractic services not usually covered by Medicare
- Podiatry services not usually covered by Medicare

## Part D OOPCs

The Medicare Current Beneficiary Survey (MCBS) file contains information on the events reported by a sample of individuals with Medicare. Each person included in the MCBS self-reports utilization of prescription drugs (MCBS PME), which is used in estimating the Part D OOPC values. Beginning in 2006, prescription drug utilization was additionally obtained from the claims reported in the Prescription Drug Event (PDE) data.

The estimated OOPC values are based upon the drug information provided for the individual sample members where each record in the MCBS PME file is considered to represent one prescription drug. The data are used in conjunction with the Calendar Year (CY) 2019 Plan Benefit Packages submitted by plans that detail the drug benefit cost sharing and plan coverage as well as the CY 2019 plan-level formulary submissions.

The process of converting the data into a suitable format for estimating the monthly out-of-pocket costs for the current program year involves a series of crosswalk and matching algorithms. Beginning with each MCBS individual's drug prescription record, the name of each drug as described by the beneficiary is identified and linked to appropriate National Drug Codes (NDCs). To associate the MCBS drugs to NDCs, a master list of drug names and their NDC(s) is first created using two commercial sources of data--First DataBank (FDB) and Medispan. Then, each MCBS prescription drug name is mapped to one or more NDCs via this master list. For MCBS drug prescription records that cannot be matched by name but can be linked to Prescription Drug Event (PDE) data, the NDC found on the PDE record is used. Beginning in 2010, drugs were identified on Part D sponsor formularies using nomenclature and unique identifiers known as RxNorm

concept unique identifier codes or RXCUIs, which were developed by the National Library of Medicine (NLM). Each RXCUI on the formulary reference file tool that is used to build plan formularies is associated with a related NDC. MCBS drugs are mapped to these RXCUIs using an NDC-RXCUI crosswalk. MCBS drugs that cannot be mapped to an RXCUI are considered non-covered drugs and their costs are not included in OOPC calculations.

An average price for each RXCUI is calculated using the 2017 PDE claims data which contains information on every prescription submitted for payment under the Part D program. The average price is calculated as the total gross expenditure (ingredient cost + dispensing fee + taxes + vaccination fee) divided by the number of PDE events, or prescriptions for that drug. Once the MCBS prescription record has been linked to a drug name, RXCUI, and average price, it is mapped to each plan's formulary and benefit package to obtain the drug cost sharing information. In instances where a drug event has been mapped into multiple RXCUIs and therefore is possibly covered on more than one tier, the RXCUI(s) associated with the lowest cost tier is (are) assigned to the event for that plan. If the RXCUI that represents an MCBS drug is not on a plan's formulary, this drug is assumed to be non-covered and the full cost, as reflected by the average price, is added to a plan's OOPC value. Generic substitution is assumed such that when a generic version of a brand drug exists and is covered on the plan's formulary, the generic version is the one included in the calculations, provided it has lower cost sharing. However, therapeutic substitution (e.g., drugs in the same therapeutic class) is not assumed. In addition, Food and Drug Administration (FDA) application type was utilized to determine the applicable/nonapplicable status of MCBS drugs for purposes of coverage gap cost-sharing estimates. This data creation process results in a file that includes the total cost of the drug for each MCBS beneficiary and prescription as well as each plan's associated cost sharing structure for that drug.

Using each plan's drug coverage status of the MCBS drugs and PBP-based cost sharing information (deductible, initial coverage limit, co-copayments and/or coinsurance, gap coverage, etc.), the beneficiary's out-of-pocket costs are calculated. The calculations are done according to the type of Part D plan (Defined Standard, Basic Alternative, Actuarially Equivalent, or Enhanced Alternative) and the associated cost share structure. The calculations are based upon the assumption that each prescription is for a one-month (30-day) supply of drugs (rather than the 60- or 90-day) from an In-Network Pharmacy. In the event that both a preferred and a non-preferred pharmacy exist, the calculations are based on the preferred pharmacy cost-sharing.

The OOPC calculations sort the drugs and assign cost sharing at the various thresholds (deductible, ICL, catastrophic). The prescriptions are reviewed sequentially, with each plan's cost sharing structure used through each phase (e.g., pre-ICL, gap, and post-ICL). The copayments are used directly in calculations of costs; the coinsurance amounts are determined by multiplying the coinsurance percentage by the full cost of the drug from the PDE data. As noted earlier, throughout the processing, the lowest cost sharing available for a given MCBS drug is used. If there is more than one matched RXCUI on a low cost tier, for a given drug name, the model uses the median of the RXCUIs' prices (grouped by brand vs. generic) to determine the total cost of each drug (and if applicable, the coinsurance). Additional plan features are also incorporated into the calculations, such as mandatory gap coverage (both the standard benefit for generic and brand drugs and the coverage gap discount program for applicable drugs), additional gap coverage offered for full and/or partial tiers, drugs with Free First Fill, and tiers that are exempt from the deductible.

For MA plans that do not offer a Part D benefit (MA-Only plans), the calculation is identical to that provided for Original Medicare beneficiaries not participating in the Part D program. This calculation applies 2017 PDE average prices to MCBS prescription counts to calculate a total non-covered drug cost.

The beneficiary level OOPC values are then aggregated to the plan level (across all beneficiaries in the data set) using the individual MCBS sample weights in order to yield nationally representative data. The annual costs are adjusted for enrollment to yield mean monthly costs. Note that some other adjustments to the data are necessary to bring valued total drug usage forward from the 2012-2013 survey years. CMS provided factors are applied to each self-reported MCBS drug prescription to account for initial survey underreporting and then for increased annual usage between 2012-2013 and 2018.

## Troubleshooting

Below are several areas where users have had problems running the model.

### Wrong or Missing Directory Locations

Make sure that all directories listed in the edited SAS programs correspond to the locations and names of the directories you have set up on your workstation. If an “input” directory is empty, the following type of error can show up in the SAS log while attempting to run the **CIMPORT.SAS** or **Part D\_FORM.SAS** programs.

**NOTE: Library IN does not exist.**

**ERROR: Library IN does not exist.**

**NOTE: Library OUTPUT does not exist.**

**ERROR: Physical file does not exist, c:\oopc\input\person.xpt**

If an incorrect directory name for input data is listed in the OOPCV1P.SAS program, the following type of error may be displayed in the SAS log.

%LET DIR = c:\oopc\formulary (correct)

%LET DIR = c:\oopc\form (incorrect)

**ERROR: Library FORMULARY does not exist.**

**ERROR: Unable to open catalog FORMULARY.FORMATS.**

### Problems with Output Files

Each new SAS run should have a new unique output file name designated in the **OOPCV1P.SAS** program. If you do not change the name from a previously created Excel file, the new SAS run will overwrite the old file contents, or if the current Excel file is open, will not produce output at all. An example error message is shown below:

**ERROR: The MS Excel table OOPCS\_2019 has been opened for OUTPUT. This table already exists, or there is a name conflict with an existing object. This table will not be replaced. This engine does not support the REPLACE option.**

**ERROR: Export unsuccessful. See SAS Log for details.**

Another message will be generated if you forget to create an output directory. For example,

**ERROR: Connect: 'c:\oopc\output\OOPC\_RUN2019V1\_20190415.xls' is not a valid path. Make sure that the path name is spelled correctly and that you are connected to the server on which the file resides.**

**ERROR: Error in the LIBNAME statement.**

Also, you may submit a run, find no “Error” messages in the **OOPCVIP.SAS** program, and yet find no Excel output file. One way this can happen is if the plan identifiers in the **PLANLIST.TXT** file are filled out without the final 3 segment identifiers, e.g.:

H9999001

### Problems with Insufficient Hard Drive Space

If you have been running the model repeatedly, you may encounter the following error message:

**WARNING: File 'WORK.xxxxxx.DATA' is shorter than expected.  
ERROR: The file WORK.xxxxxx.DATA is shorter than expected.  
ERROR: The file WORK.xxxxxx.DATA is shorter than expected. ERROR:  
The file WORK.xxxxxx.DATA is shorter than expected. WARNING: Data set  
WORK.yyyyyy was not replaced because this step was stopped.  
ERROR: The open failed because library member WORK.xxxxxx.DATA  
is damaged.  
ERROR: The open failed because library member WORK.xxxxxx.DATA  
is damaged.  
ERROR: The open failed because library member WORK.xxxxxx.DATA  
is damaged.**

This problem means that SAS does not have sufficient hard disk space for its temporary files. You can reboot your machine so that more memory is available to SAS. Also, check that you do not have 'leftover' SAS temporary directories. An example of SAS temporary directories that may remain from other sessions under 'My Computer' is:

c:\Documents and Settings\yourname\Local Settings\Temp\SAS Temporary  
Files\  
with subdirectories such as:  
TD\_xxxxx  
SAS\_util000100000150\_machinename

## Part D or Part C Output Expected, but Blank

When you have completed your PBP data entry, make sure you have exit/validated from the program. In one case, the Part C output for a plan appeared as a series of zeroes because Section D of the PBP had not been completed.

Also, output may not be produced if the formulary IDs are not formatted correctly (i.e., tab-delimited) or if they are formatted differently in the two input files: **FORMULARY.TXT** and **PLAN\_FORMULARY.TXT**.

## Running SAS 9.3/9.4 Using a 32-Bit Version of Office

The CY2019 OOPC model has been developed and tested using SAS 9.4 on 64-Bit hardware using a 64-Bit version of Windows Office 10 (Excel and Access). In a case where SAS 9.4 was run on 64-Bit hardware while using a 32-Bit version of Access and Excel (e.g. Office 2007), the following message has been observed:

```
602 +LIBNAME PBP ACCESS "&PBP\PBP&RUNYEAR..MDB";  
ERROR: Connect: Class not registered  
ERROR: Error in the LIBNAME statement.
```

To correct this error, one option would be to install a 64-Bit version of Office. However, to continue using 32-Bit Office, (for SAS 9.3 or 9.4) choose “SAS PC Files Server” from the SAS installation options and then modify the engine option required to read the Access and Excel files to the existing programs in the OOPC Model package:

```
PBP_IMPORT.SAS
```

Change from:

```
LIBNAME PBP ACCESS "&PBP\PBP&RUNYEAR..MDB";
```

to:

```
LIBNAME PBP PCFILES path="&PBP\PBP&RUNYEAR..MDB";
```

```
PBP_IMPORT_PARTD.SAS
```

In the following section, change the DBMS engine name from ACCESS to ACCESSCS:

```
PROC IMPORT OUT= WORK.PBP_FILE_PARTD  
  DATATABLE= "PBP"  
  DBMS=ACCESSCS REPLACE;  
  DATABASE="&PBP\PBP&RUNYEAR..MDB";  
  SCANMEMO=YES;  
  USEDATE=NO;  
  SCANTIME=YES;  
RUN;
```

Even after doing the above steps, another error message resulted:

**ERROR: CLI error trying to establish connection:  
[Microsoft][ODBC Microsoft Access Driver]General error Unable  
to open registry key  
Temporary (volatile) Ace DSN for process 0x2b4 Thread  
0x26ec DBC 0x263780c Jet'.  
ERROR: Error in the LIBNAME statement.**

To correct this error, check where the PBP files are saved and make sure that the SAS program OOPCV1P.sas “PBPDIR = c:\program file\pbp2019;” line references the correct subdirectory.

### Running the Model Using an Older Version of SAS 9.3

In another case a user had an older version of SAS 9.3 (TS1M1), which has a problem writing to output (Excel) files. The update to SAS 9.3 (TS1M2) fixed this issue. One solution is to update the version of SAS 9.3 installed on your machine.

Alternatively, SAS support reports a fix that can be made. This assumes that the model is being run with SAS 9.3 on 64-Bit hardware using a 64-Bit version of Windows Office:

In the program called PLAN\_CATNAME\_NEW.SAS, which is in the Input subdirectory of the OOPC package, there are two PROC EXPORTs near the end of the program. Change options "DBMS=XLSX" to "DBMS=EXCEL" in both of these procedures and resave this program, before rerunning the main program (OOPCV1P.SAS). In this case, the resulting output will be an .XLS file.

Here is a sample of the PROC EXPORT code:

```
%IF &INPUT=INPUTMPF %THEN %DO;  
PROC EXPORT DATA=OOPCS_ALL_FINAL_CD_MGAPFFS  
OUTFILE= "&OOPC_W_MGAPFFS"  
DBMS=EXCEL REPLACE;  
SHEET="OOPCS &RUNYEAR";  
RUN;  
%END;
```

## Testing

Before starting a run of the **OOPCV1P.SAS** program, it may be worth running a test on one plan to check that the data and directory locations have been set up correctly. As stated in Step 1 of the instructions, the selection of plans can be modified in the **PLANFILE.TXT** file.