

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
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TO: All Part D Plans

FROM: Cynthia G. Tudor, Ph.D., Director, Medicare Drug Benefit and C & D Data Group

SUBJECT: Updated Part D Sponsor Automated TrOOP Balance Transfer Operational Guidance

DATE: October 21, 2008

Since CMS' issuance of the CMS Part D sponsor automated TrOOP balance transfer (TBT) implementation guidance in March 2008, CMS has continued to participate in an industry-wide task group to discuss questions concerning the implementation and operation of the new automated TBT process. The task group asked us to update our March guidance to formalize in policy the clarifications we have made in the intervening months in response to the task group's questions. The revised guidance (v2) is attached and includes these policy clarifications; revisions are in red italics.

This guidance contains information about the role of the TrOOP Facilitator and the responsibilities of the Part D sponsors in the automated TBT process, including situations involving multiple enrollments within a contract, multiple plan enrollment types, non-calendar year plans, correction of unacceptable responses, and exceptions from automated processing. As noted previously, the guidance should be used to augment the National Council for Prescription Drug Programs (NCPDP) Financial Information Reporting Standard Implementation Guide v1.0 dated January 22, 2008, which is available to members on the NCPDP website at <http://www.ncpdp.org>.

The new automated TBT process will be implemented January 1, 2009. To ensure all Part D sponsors and their processors are prepared as of that date to accept and process transactions for 2009 beneficiaries, Part D sponsors must successfully complete all pre-implementation certification testing by November 1, 2008. We appreciate the assistance of Part D sponsors and processors in developing the certification testing protocols and the timeliness of their responses to our requests for information and contacts with the TrOOP Facilitator to schedule and complete the certification process. If any sponsor fails to meet the certification testing requirements, that sponsor will be subject to appropriate compliance action by CMS.

If you have any questions regarding this guidance, please contact Deborah Larwood at (410) 786-9500 or deborah.larwood@cms.hhs.gov.