

#	Form	Change	Current Location	Reason
1	Supporting Statement A	Added "pursuant to the Paperwork Reduction Act (44 U.S.C. 3501 et seq.)"	Page 2 - Paragraph 1.	To reference statutory authority.
2	Supporting Statement A	Deleted "to" from "...that included its recommendations..."	Page 3 - Paragraph 5.	Deleted as unnecessary.
3	Supporting Statement A	Changed date from April 18 to April 15.	Page 4 - Paragraph 1.	Revised for accuracy.
4	Supporting Statement A	Inserted comma after "inform policy making."	Page 4 - "Information Users."	Grammar.
5	Supporting Statement A	Revised "CMS intends to use the FFSDCS for electronically obtaining drug acquisition cost information for each SCOD acquired by the hospital over a one year period from July 1, 2024 through June 30, 2025, with the survey open January 1, 2026, through March 31, 2026" to "CMS intends to use the FFSDCS for electronically obtaining drug acquisition cost information for each SCOD, and drugs and biologic CMS historically treats as SCODs, already acquired by the hospital over a one year period from July 1, 2024 through June 30, 2025, with the survey open January 1, 2026, through March 31, 2026."	Page 4 - "Use of Information Technology."	Revised for accuracy.
6	Supporting Statement A	Added "which".	Page 4 - "Use of Information Technology."	Added for clarity.
7	Supporting Statement A	Revised "The previously approved package (CMS-10709) is not sufficient to collect the required information as it only surveyed certain hospitals paid under the OPFS, whereas now we are surveying all hospitals paid under the OPFS" to "The previously approved package (CMS-10709) is not sufficient to collect the required information as it only surveyed certain hospitals paid under the OPFS, whereas now we are surveying all hospitals paid under the OPFS for all discounts contributing to a hospital's net acquisition cost for a drug."	Page 5 - "Duplication of Efforts."	Added to further clarify how existing survey differs from 2020 survey.
8	Supporting Statement A	Revised "As such, the collection of these data is essential" to "As such, the collection of these data are essential."	Page 5 - "Less Frequent Collection."	Revised for accuracy.
9	Supporting Statement A	Replaced "We believe that this frequency will appropriately balance the burdens imposed on hospitals of completing the survey with ensuring that we capture the required data to inform payment rates under section 1833(i)(4)(D)(i)(ii) of the Act" with "We believe that this frequency will appropriately balance hospitals' burdens in completing the survey with ensuring that we capture the required data to inform payment rates under section 1833(i)(4)(D)(i)(ii) of the Act."	Page 5 - "Less Frequent Collection."	Revised for clarity.
10	Supporting Statement A	Added display date and published date of CY 2026 OPFS/ASC proposed rule.	Page 6 - "Federal Register/Outside Consultation."	To include these dates now that they are known.
11	Supporting Statement A	Replaced "Only the Department of Health and Human Services (HHS), The Executive Office of the President (EOP), and CMS and their contractor(s) will have access to these data" with "Only the Department of Health and Human Services (HHS) and relevant component agencies, their contractors and the Executive Office of the President (EOP), and CMS and their contractor(s) will have access to these data."	Page 6 - "Confidentiality."	Revised to ensure all appropriate entities are included.
12	Supporting Statement A	Replaced "73.5" hours to complete the survey with "80.5" hours to complete the survey.	Page 7 - "Burden Estimates (Hours & Wages)"	To reflect updated assessment of burden of completing the survey.
13	Supporting Statement A	Inserted comma after "Then" in "Then the pharmacy technician requests data from suppliers..."	Page 7 - Second bullet.	Grammar.
14	Supporting Statement A	Replaced "11 hours per response" to "8" hours per response.	Page 7 - "Table 1 Salary Estimates for Providers Completing the Survey", Row 4, Column 2.	To reflect updated assessment of burden of completing the survey.
15	Supporting Statement A	Replaced "\$141.88" cost per response with "\$1,135.04" cost per response.	Page 7 - "Table 1 Salary Estimates for Providers Completing the Survey", Row 4, Column 5.	To reflect updated assessment of burden of completing the survey.
16	Supporting Statement A	Replaced "4,053.93" total annual cost per response" with "5,047.15" total annual cost per response.	Page 7 - "Table 1 Salary Estimates for Providers Completing the Survey", Row 6, Column 5.	To reflect updated assessment of burden of completing the survey.
17	Supporting Statement A	Replaced "\$4,053.93" total annual cost per response" with "\$5,047.15" total annual cost per response. Replaced "3,500" hospitals with "4,500" hospitals. Replaced "\$14,188.96" total estimated cost across all survey responses with "\$22,712.175" total estimated cost across all survey responses.	Page 8 - "Table 1 Salary Estimates for Providers Completing the Survey", Row 7.	To reflect updated assessment of burden of completing the survey.
18	Supporting Statement A	Replaced "3,500" respondents with "4,500" respondents. Replaced "73.5" burden per response with "80.5" burden per response. Replaced "257,250" total annual burden (hours) with "362,250" total annual burden (hours).	Page 8 - "Table 2. Hourly Burden Estimates for the Survey", Row 2, Columns 2,4 and 5.	To reflect updated assessment of burden of completing the survey.
19	Supporting Statement A	Deleted "We note there may be slight adjustments to this NDC list, but we expect the final list will be similar to the draft list."	Page 9 - "A. An Example of the survey collection instrument, consisting of an Excel File Template."	To reflect that the final list has been created.
20	Supporting Statement A	Revised "This 12-month period of time..." to "This 12-month time period..."	Page 9 - "A. An Example of the survey collection instrument, consisting of an Excel File Template."	Improved clarity.
21	Supporting Statement A	Revised "For the NDCs included in the template, we excluded radiopharmaceutical NDCs from our proposed list of NDCs" to "For the NDCs included in the template, we excluded radiopharmaceutical NDCs from our list of NDCs."	Page 9 - "A. An Example of the survey collection instrument, consisting of an Excel File Template."	To reflect that the final list has been created.
22	Supporting Statement A	Revised "Included in the Excel File Template is a tab that contains draft instructions, including relevant terms and definitions, on how to fill out the survey. These instructions will continue to be refined to ensure clarity for those submitting the survey" to "Included in the Excel File Template is a tab that contains instructions, including relevant terms and definitions, on how to fill out the survey."	Page 9 - "B. Survey Instruction Sheet."	To reflect that the instructions are now final.
23	Supporting Statement A	Replaced "will be" with "has been."	Page 9 - "C. OPFS Drug Acquisition Cost Survey Website."	To clarify that the website has been created.
24	Supporting Statement A	Replaced general website with survey specific website.	Page 9 - "C. OPFS Drug Acquisition Cost Survey Website."	To provide the actual website location now that it has been created.
25	Supporting Statement A	Deleted "in order."	Page 9 - "C. OPFS Drug Acquisition Cost Survey Website."	Deleted for clarity.

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1	Supporting Statement B	Replaced "3,500" hospitals with "4,500" hospitals	Page 1 - Paragraph 1.	To more accurately reflect the number of survey respondents.
2	Supporting Statement B	Replaced "CMS will ask each hospital that was paid under the OPPTS to respond to a survey" with "All hospitals paid under the OPPTS are required to respond to this survey." Deleted "We expect all hospitals paid under the OPPTS to respond to the survey."	Page 1 - Paragraph 1.	To make it clear that hospitals are required to respond to the survey.
3	Supporting Statement B	Revised "We expect all hospitals paid under the OPPTS to respond to the survey" to "As described above, this is a required survey"	Page 1 - Paragraph 2.	To make it clear that hospitals are required to respond to the survey.
4	Supporting Statement B	Replaced "CMS will announce the plan" to "CMS announced its plan."	Page 1 - Paragraph 3.	To indicate that the plan to conduct the survey has been announced.
5	Supporting Statement B	Added footnotes for links to proposed and final rules.	Page 1 - Paragraph 3.	To provide links to references to proposed and final rules.
6	Supporting Statement B	Revised "Additionally, CMS will announce the plan to collect data through the Medicare Learning Network® (MLN) and Medicare Administrative Contractors (MACs)" to "Additionally, CMS will communicate the plan to collect data through the Medicare Learning Network® (MLN)."	Page 2 - Paragraph 1.	Revised to indicate that CMS will communicate its plan to collect data through the MLN but not also the MACs.
7	Supporting Statement B	Revised "If a hospital does not respond to the survey, CMS will not assume a response from the hospital and will mark the hospital down as a "non-respondent" to "If a hospital does not respond to the survey, CMS will mark the hospital down as a "non-respondent."	Page 2 - Paragraph 1.	Improved clarity.
8	Supporting Statement B	Revised "For example, since a failure on the part of a hospital to respond to the survey could suggest that the hospital has minimal acquisition costs, or has lower acquisition costs than an otherwise similar hospital that responds to the survey and so is withholding its response strategically, we might, if the data so suggests, determine that groups of hospitals who do not respond to the survey have lower, or categorically different, acquisition costs for SCODs, and non-SCODs, than their otherwise similar counterparts under section 1833(t)(14)(A)(iii)(I) of the Act" to "For example, a failure on the part of a hospital to respond to the survey could suggest that the hospital has minimal acquisition costs, or has lower acquisition costs than an otherwise similar hospital that responds to the survey, and the hospital is strategically withholding its response. In this case, if the data suggests, we may determine that groups of hospitals who do not respond to the survey have lower, or categorically different, acquisition costs for SCODs, and non-SCODs, than their otherwise similar counterparts under section 1833(t)(14)(A)(iii)(I) of the Act."	Page 2 - Paragraph 2.	Improved clarity.
9	Supporting Statement B	Revised "...for payment of hospitals that do not respond to the survey..." to "...for payment for hospitals that do not respond to the survey..."	Page 2 - Paragraph 2.	Grammar.
10	Supporting Statement B	Revised "Hospitals had ample notice in the CY 2026 OPPTS/ASC proposed rule..." to "Hospitals had ample notice in the CY 2026 OPPTS/ASC proposed and final rules..."	Page 2 - Paragraph 4.	To include reference to final rule now that it has been released.
11	Supporting Statement B	Revised "...we anticipate hospitals would want to respond to the survey to demonstrate to CMS these costs" to "...we anticipate hospitals would want to respond to the survey to demonstrate these costs to CMS."	Page 3 - Paragraph 1.	Improved clarity.

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	Removed “Reported costs should reflect all discounts and rebates received by the hospital. If a discount or rebate is received but is not reflected in the cost data pulled from the purchasing system, please estimate the approximate discount received for each NDC, deduct that amount from the NDC cost, and report the final cost with all deductions in the template.” and replaced with “Reported costs should reflect discounts and rebates received by the hospital for individual NDCs. These NDC-level discounts or rebates are typically already accounted for in invoices. Discounts and rebates received that do NOT correspond to individual NDCs, and are not able to reasonably be incorporated into their NDC acquisition costs, such as purchase volume rebates, will be collected separately and should NOT be reported using this template.”	Overview Paragraph	This update reflects the change to the data collection approach based on comments received.
Survey Instructions	Removed “after accounting for all discounts, rebates, and financial concessions.” and replaced with “Account only for discounts, rebates, and financial concessions that were applied at the NDC-level.”	Cell C8	This update reflects the change to the data collection approach based on comments received.
Survey Instructions	Removed “ after accounting for all applicable discounts, rebates, and financial concessions.” and replaced with “Account only for discounts, rebates, and financial concessions that were applied at the NDC-level.”	Cell C10	This update reflects the change to the data collection approach based on comments received.