

**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 the 60-Day and 30-Day Documents***

Location of Edits	Summary of Changes (Included for 30-day Comment Period)	Type of Change	Explanation of Changes	Burden Change (Yes/No)
Supporting Statement: Outside Consultation and Burden Estimates	<ul style="list-style-type: none"> Included discussion of revisions to each appendix based on public comment. Included discussion of changes to burden estimates based on public comment. 	Modify	Revisions made to appendices in response to external comments	Yes
Appendix A: Section 1 of Part 1 of the Dispensing Entity and Third-Party Support Entity Enrollment Form	<ul style="list-style-type: none"> Revised instructions to outline capabilities among various user roles and state that additional information on user management will be detailed in forthcoming technical instructions 	Modify	Revisions made in response to external comments	No
Appendix A: Section 2 of Part 1 of the Dispensing Entity and Third-Party Support Entity Enrollment Form	<ul style="list-style-type: none"> Removed “Dispensing Entity Selection,” a series of questions seeking dispensing entity input on its operating structure and industry segment that appeared in the 60-day package and replaced with “Dispensing Entity Identification Information” (previously Section 3) Revised instructions for questions 1, 1A, and 2, relating to a new question seeking authorization for MTF to use National Council of Prescription Drug Programs (NCPDP) data to optimize MTF Data Module enrollment procedures for dispensing entities (see Question 1) Revised instructions for question 3, relating to questions about material cashflow concerns, and clarified that responses are optional and will be treated as confidential Added response option for question regarding material cashflow (“I prefer to not answer”) since this question is optional Replaced one field in one question seeking entry of numeric codes for NCPDP “Parent Organization ID” with entry of “Legal Business Name” and “Doing Business As (DBA)” Name to enable, if applicable, better leveraging of NCPDP data among both community/independent dispensing entities and chain pharmacies 	Modify	Revisions made in response to external comments	Yes (burden reduction)

*Question numbering matches final document.

Location of Edits	Summary of Changes (Included for 30-day Comment Period)	Type of Change	Explanation of Changes	Burden Change (Yes/No)
	<ul style="list-style-type: none"> Added one field in one question seeking entry of numeric code for NCPDP “Provider ID” for non-chains Removed questions asking whether dispensing entity chain home office is authorized to receive MFP refund payments on behalf of all its associated stores Removed table requesting dispensing entity to manually enter identifying and financial information for associated dispensing entities, such as franchise pharmacies, in the event the dispensing entity chain home office cannot receive MFP refund payments on their behalf 			
Appendix A: Section 3 of Part 1 of the Dispensing Entity and Third-Party Support Entity Enrollment Form	<ul style="list-style-type: none"> Revised instructions for questions 1, 1A, 1B, 1C, relating to a series of questions about a dispensing entity’s MFP refund payment instructions on where payments should be sent: <ul style="list-style-type: none"> Instructions for questions 1 and 1A now clarify that the dispensing entity retains the option to have MFP refund payments sent either to itself or to a third-party support entity Instructions for question 1B now clarify that banking information from each enrolling dispensing entity is required, regardless of their use of a third-party support entity, and will be used as necessary in the event of any unforeseen circumstances that interrupt sending payment to a designated third-party support entity Instructions for question 1C now clarify that MFP refund payments for large chains will be directed to a single bank account; any subdivisions or locations within a large chain that require payments to be deposited into a separate bank account must enroll separately Removed questions seeking information and explanation on services contracted between dispensing entity and third-party support entity 	Modify	Revisions made in response to external comments	Yes (burden reduction)

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Location of Edits	Summary of Changes (Included for 30-day Comment Period)	Type of Change	Explanation of Changes	Burden Change (Yes/No)
	<ul style="list-style-type: none"> Added one sub-question each under Question 1 and 1A asking dispensing entity to confirm whether the dispensing entity is using a third-party support entity for purposes of the MTF to enable system-wide verifications Added one question (as applicable) asking that the dispensing entity confirm that the dispensing entity and the third-party support entity or entities named in Questions 1 and 1A have mutually agreed on the specified arrangement Clarified that dispensing entities retain the option to have MFP refund payments sent either to a third-party support entity or directly to the dispensing entity Revised text fields for two questions asking dispensing entity to confirm to which entity MFP refund payments and ERAs/remittance advice should be sent Added clarifying instructions that banking information from all enrolling dispensing entities is required and will be stored and used only as needed Added one question requesting a yes/no response on if the dispensing entity is a nonprofit organization and provided clarification that nonprofit dispensing entities will not receive IRS Form 1099 Added one question requesting bank account holder/dispensing entity details in order to validate payment Revised response field for bank account type from text field to drop down menu with options of checking or savings 			
Appendix A: Section 4 of Part 1 of the Dispensing Entity and Third-Party Support Entity Enrollment Form	<ul style="list-style-type: none"> Revised title to “Dispensing Entity MFP Refund Payment Instructions for Primary Manufacturers Not Participating in the MTF Payment Module” Clarified that information to be shared with Primary Manufacturers that do not use the MTF Payment Module will be kept confidential Added questions for dispensing entity to confirm dispensing entity MFP refund payment instructions to a third-party 	Modify	Technical changes	No

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Location of Edits	Summary of Changes (Included for 30-day Comment Period)	Type of Change	Explanation of Changes	Burden Change (Yes/No)
	support entity for Primary Manufacturers that do not utilize the MTF Payment Module			
Appendix A: Section 5 of Part 1 of the Dispensing Entity and Third-Party Support Entity Enrollment Form	<ul style="list-style-type: none"> Added clarifying instructions regarding points of contact Delineated field requesting “name” into “first name” and “last name” 	Modify	Technical changes	No
Appendix A: Part 2 of the Dispensing Entity and Third-Party Support Entity Enrollment Form	<ul style="list-style-type: none"> Added clarifying instructions regarding eligibility to fill out form 	Modify	Technical changes	No
Appendix A: Section 2 of Part 2 of the Dispensing Entity and Third-Party Support Entity Enrollment Form	<ul style="list-style-type: none"> Removed table requesting information on contracted services and effective dates with applicable dispensing entities 	Modify	Revisions made in response to external comments	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"> Added clarifying instructions in question 1 Added question requesting a yes/no response on if the third-party support entity is a nonprofit organization and provided clarification that nonprofits will not receive IRS Form 1099. Revised response field for bank account type from text field to drop down menu with options of checking or savings 	Modify	Technical changes	No
Appendix A: Section 4 of Part 2 of the Dispensing Entity and Third-Party Support Entity Enrollment Form	<ul style="list-style-type: none"> Added clarifying instructions to indicate that the point of contacts can be anyone in the third-party support entity who is familiar with the responses to the questions in the form and can provided timely responses if follow-up with the third-party support entity is needed Delineated field requesting “name” into “first name” and “last name” 	Modify	Technical changes	No
Appendix B: Introduction	<ul style="list-style-type: none"> Added language regarding agency’s plan to redact and share the MFP effectuation plan with dispensing entities and, potentially, other stakeholders 	Modify	Revisions made in response to external comments	No
Appendix B: General Layout	<ul style="list-style-type: none"> Sections 2 and 4 were switched, along with all associated question numbers. 	Modify	Clarifications based on comments received and to	No

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Location of Edits	Summary of Changes (Included for 30-day Comment Period)	Type of Change	Explanation of Changes	Burden Change (Yes/No)
			align with emerging MTF DM system functionality	
Appendix B: General Instructions Overview	<ul style="list-style-type: none"> Updated outline depicting the organization of the form's sections 	Modify	Clarifications based on comments received and to align with emerging MTF DM system functionality	Yes (burden reduction)
Appendix B: General Instructions Submission Method	<ul style="list-style-type: none"> Explanation added about which fields will be an electronic response and which will be a part of the editable PDF uploaded by manufacturers 	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"> Entire section replaced and questions deleted 	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"> Questions moved to form a new Section 1 	Modify	Reorganization to align with emerging MTF DM system	No
Appendix B: Section 1 Introduction	<ul style="list-style-type: none"> Added language explaining the approach to protecting proprietary information provided within the Form. 	Modify	Clarification based upon external comments	No
Appendix B: Section 1, Question 2B	<ul style="list-style-type: none"> Clarified that account type must be either checking or savings Added field requesting Primary Manufacturer's Federal Tax Identification Number (TIN) to aid in payment facilitation 	Modify	Technical changes	Yes
Appendix B: Section 2 Introduction	<ul style="list-style-type: none"> Added language explaining the redactions that will be made to information entered in this section before the MFP Effectuation Plans are disclosed Added language explaining that this section will begin the fillable PDF that will be uploaded into the MTF DM 	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"> Added language explaining that the refund calculation approach is only applicable to Primary Manufacturers using retroactive reimbursement to effectuate the MFP. Added numbering and separated the options a Primary Manufacturer can choose when responding to this question 	Modify	Revisions made in response to external comments	No

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Location of Edits	Summary of Changes (Included for 30-day Comment Period)	Type of Change	Explanation of Changes	Burden Change (Yes/No)
Appendix B: Section 4 Question 12	<ul style="list-style-type: none"> Removed requirement that Primary Manufacturers list, or upload, the NPIs of dispensing entities with which a Primary Manufacturer has an alternative arrangement 	Modify	Revisions made in response to external comments	Yes (burden reduction)
Appendix B: Section 4 Question 13	<ul style="list-style-type: none"> Added language informing Primary Manufacturer that CMS may still request NPI information no longer requested in Question 10 	Modify	Revisions made in response to external comments	No
Appendix B: Section 4 Question 14	<ul style="list-style-type: none"> Added language clarifying when a response is required to this question 	Modify	Revisions made in response to external comments	No
Appendix B: Section 4 Question 15	<ul style="list-style-type: none"> Added language clarifying that acknowledgement is required. 	Modify	Revisions made in response to external comments	No
Appendix B: Section 4 Questions 16 – 20 Instructions	<ul style="list-style-type: none"> Added language regarding Secondary Manufacturer relationships 	Modify	Revisions made in response to external comments	No
Appendix B: Section 3 Introduction	<ul style="list-style-type: none"> Added language explaining the redactions that will be made to information entered in this section before the MFP Effectuation Plans are disclosed Added language clarifying when a Primary Manufacturer must complete this section 	Modify	Revisions made in response to external comments	No
Appendix B: Section 2 (Former Section 4) Introduction	<ul style="list-style-type: none"> Added language explaining the redactions that will be made to information entered in this section before the MFP effectuation Plans are disclosed 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 	Modify	Revisions made in response to external comments	No
Appendix B: Section 2 Question 4A	<ul style="list-style-type: none"> Entire question deleted 	Modify	Revisions made in response to external comments	No
Appendix B: Section 5 Introduction	<ul style="list-style-type: none"> Added language explaining the redactions that will be made to information entered in this section before the MFP Effectuation Plans are disclosed 	Modify	Revisions made in response to external comments	No
Appendix B: Section 5 Question 23	<ul style="list-style-type: none"> Changed “previous” to “newly submitted” for clarity and consistency. 	Modify	Clarification based upon MTF system requirements and for consistency with the rest of the paragraph	No

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Appendix B: Section 6 Introduction	<ul style="list-style-type: none"> Added language explaining the redactions that will be made to information entered in this section before the MFP Effectuation Plans are disclosed 	Modify	Revisions made in response to external comments	No
Appendix B: Section 6 Former Question 27 (now 25)	<ul style="list-style-type: none"> Changed language to conform with MTF DM system terminology 	Modify	Clarification based upon MTF DM system requirements	No
Appendix C: Overall	<ul style="list-style-type: none"> Renumbered Payment Elements due to addition of new element 	Modify	Revisions made in response to external comments	No
Section 1 Payment Element 1	<ul style="list-style-type: none"> Added new payment element that requires Primary Manufacturers to indicate whether the refund should be facilitated through the MTF PM 	Modify	Revisions made in response to external comments	Yes
Appendix C: Section 1 Payment Element 2	<ul style="list-style-type: none"> Rearranged bullets for clarity 	Modify	Revisions made in response to external comments	No
Appendix C: Section 1 Payment Element 3	<ul style="list-style-type: none"> Added new bullet to clarify that the justification codes should be based on the final disposition of the claim 	Modify	Revisions made in response to external comments	No
Appendix C: Section 1 Old Payment Element 3	<ul style="list-style-type: none"> Deleted payment element due to duplication with information on claim-level data elements 	Modify	Revisions made in response to internal discussion	No
Appendix C: Section 1 Payment Element 4	<ul style="list-style-type: none"> Added new bullet to clarify that the unit of measure for values reported in the Quantity of Selected Drug field should be the same as was reported in the data elements received from the MTF 	Modify	Revisions made in response to external comments	No
Appendix C: Section 1 Payment Element 3	<ul style="list-style-type: none"> Added a new bullet to clarify the difference between Code 2 and Code 7 	Modify	Revisions made in response to external comments	No
Appendix C: Section 1 Payment Element 4	<ul style="list-style-type: none"> Added a new bullet to clarify how the payment element should be completed when a claim is adjusted or reversed 	Modify	Revisions made in response to external comments	No
Appendix C: Section 1 Payment Element 5	<ul style="list-style-type: none"> Added a new bullet to clarify how the payment element should be completed when a claim is adjusted or reversed 	Modify	Revisions made in response to external comments	No
Appendix D: Section 2 Question 1	<ul style="list-style-type: none"> Added option picklists 	Modify	Revisions made in response to external comments	No
Appendix D: Section 2 Question 3	<ul style="list-style-type: none"> Added contextual text fields related to the X12 835 ERA 	Modify	Revisions made in response to external comments	No
Appendix D: Form Organization	<ul style="list-style-type: none"> Re-phrased and re-ordered several sections in the form to improve flow and user experience 	Modify	Technical change	No

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Appendix D: Section 1 Question 5A	<ul style="list-style-type: none"> CMS increased the number of supporting documents permitted for upload from 5 documents to 10 documents 	Modify	Revisions made in response to external comments	No

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