

DEPARTMENT OF HEALTH & HUMAN  
SERVICES  
Centers for Medicare & Medicaid Services  
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**CENTER FOR MEDICARE**

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**DATE:** December 6, 2024  
**TO:** All Part D Sponsors  
**FROM:** Jennifer R. Shapiro, Director, Medicare Plan Payment Group  
**SUBJECT:** January 2025 Updates to the Drug Data Processing System (DDPS)

The Centers for Medicare & Medicaid Services (CMS) is announcing upcoming changes to the Drug Data Processing System (DDPS), effective January 1, 2025. These changes coincide with the 1000-byte Prescription Drug Event (PDE) File Layout expansion and the introduction of new financial fields on the PDE record in support of the Manufacturer Discount Program (Discount Program), effective January 1, 2025. CMS is posting a new DDPS Edit Spreadsheet on the Customer Service Support Center (CSSC) Operations website (available [here](#)) concurrent with the release of this memo. The DDPS Edit Lookup tool on the CSSC Operations website will reflect these changes effective January 1, 2025.

Due to the significant number of changes beginning January 1, 2025, this new DDPS Edit Spreadsheet will act as a full replacement of the previously posted version, which was effective July 1, 2024, and will include both new edits and revisions to existing edit descriptions. In general, the “Message to be Reported” column has been shortened to describe the main discrepancy, while the “Comments/Rationale” column has been expanded to provide additional details associated with the edit. Edits that are considered obsolete have been removed but can still be referenced via previously posted versions of the DDPS Edit Spreadsheet. Additionally, the existing column named “Edit Applicable (Y/N): PACE” has been split into two columns to differentiate which edits are applicable to Programs of All-inclusive Care for the Elderly (PACE) organizations for PDEs with a DOS either prior to or as of January 1, 2025. The new column names are “Edit Applicable (Y/N): PACE (DOS <= 12/31/2024)” and “Edit Applicable (Y/N): PACE (DOS >= 01/01/2025)”.

Please submit questions regarding these updates to [PDE-Operations@cms.hhs.gov](mailto:PDE-Operations@cms.hhs.gov).

**New Edits Added**

The following new edits have been added to the DDPS Edit Spreadsheet effective January 1, 2025.

**Edit 748:** NDC not covered under Part D on DOS.

**Edit 749:** Quantity Dispensed must be  $\leq$  Quantity Prescribed.

**Edit 821:** NPP must be  $\geq$  \$0.

**Edit 881:** TrOOP Accumulator + Delta TrOOP > OOP threshold.

**Edit 882:** Negative NPP must reduce/offset LICS.

**Edit 931:** Reported Manufacturer Discount must be \$0 for MSP and COB PDEs.

**Edit 932:** Reported Manufacturer Discount must be \$0 for non-applicable drugs.

**Edit 933:** Reported Manufacturer Discount must be \$0 when Service Provider ID Qualifier = '99'.

**Edit 934:** Reported Manufacturer Discount must be \$0 when TrOOP < annual deductible.

**Edit 935:** Reported Manufacturer Discount  $\neq$  CMS Calculated Manufacturer Discount  $\pm$  \$0.05.

**Edit 936:** Reported Manufacturer Discount > amount estimated by CMS + \$0.05.

**Edit 937:** Reported Manufacturer Discount  $\leq$  amount estimated by CMS.

**Edit 940:** Reported Manufacturer Discount must be \$0 for compound drugs.

**Edit 961:** Pharmacy Price Concessions at POS is missing or invalid.

**Edit 962:** Submission Type Code 1 – 5 field(s) invalid.

**Edit 963:** LTPAC Dispense Frequency is missing or invalid.

**Edit 964:** Selected Drug Subsidy is missing or invalid.

**Edit 965:** Medicare Prescription Payment Plan Indicator is missing or invalid.

**Edit 966:** Reported Manufacturer Discount is missing or invalid.

**Edit 981:** Reported Manufacturer Discount must be \$0 for non-covered drugs.

**Edit 982:** Medicare Prescription Payment Plan Indicator not permitted for non-covered drugs.

**Edit 986:** Quantity Prescribed is missing or invalid.

### **Obsolete Edits Removed**

The following edits have been removed from the DDPS Edit Spreadsheet effective January 1, 2025. These edits are obsolete and will not be encountered on PDE submissions in the 1000-byte layout.

**Edit 617:** The Dispensing Status is invalid. For DOS prior to 1/1/2011, the Dispensing Status must be either a blank or 'P' or 'C'. For DOS 1/1/2011 and forward, the Dispensing Status must be blank.

**Edit 642:** State-to-Plan PDEs are not allowed with dates of service after March 31, 2006.

**Edit 643:** State-to-Plan PDEs are not allowed with non-covered drugs.

**Edit 644:** Service Provider ID Qualifier must be '07' for State-to-Plan PDEs.

**Edit 645:** Service Provider ID '5300378' allowed only for State-to-Plan PDEs.

**Edit 659:** The Gap Discount Plan Override Code is invalid. Must be blank.

**Edit 663:** Value of Dispensing Status on adjustment record and the record to be adjusted must be the same.

**Edit 672:** For DOS prior to 1/1/2011, if Catastrophic Coverage Code is 'A', GDCB must be greater than zero.

**Edit 693:** Sum of Cost Fields < Sum of Payment Fields +/- Rounding Error and Dispensing Status is 'C'.

**Edit 694:** The sum of Ingredient Cost, Dispensing Fee, and Vaccine Administration Fee or Additional Dispensing Fee must be >= zero.

**Edit 722:** Dollars reported in LICS are greater than zero. However, beneficiary is not eligible for LICS subsidy in CMS systems. Plans must have documented evidence to substantiate LICS.

**Edit 736:** DOS < NDC effective date.

**Edit 737:** Inappropriate Drug coverage status code. Drug Coverage is not 'O' although the drug is on the OTC list.

**Edit 739:** This NDC is for a drug that is usually covered under Part B. If Plan determines that this drug is Part B covered, submit deletion record.

**Edit 740:** NDC is DESI drug.

**Edit 741:** The drug is always excluded from Part D; the drug is always covered by Part B.

**Edit 769:** If Drug Coverage Status Code is 'E' or 'O', then the Gap Discount Plan Override Code must be blank.

**Edit 775:** Incompatible Dispensing Status (blank cannot follow 'C' or 'P'). Record for a Partl ('P') or Compl ('C') fill is on file for this disp event. DDPS cannot accept another record with Disp Status = blank for the same dispensing event.

**Edit 776:** Incompatible Dispensing Status ('C' or 'P' cannot follow 'blank'). Record with unspecified fill status (blank) is on file for this same dispensing event. DDPS cannot accept another record with Partl ('P') or Compl ('C') fill for the same dispensing event.

**Edit 780:** Service Provider ID Qualifier must be '01' - NPI or '07' - NCPDP on standard claim.

**Edit 782:** Record had no error, but was submitted as part of a rejected batch. DDPS rejects batches with error rates exceeding 50%.

**Edit 810:** The Estimated Remuneration at POS Amount (ERPOSA) is invalid. Must equal zero in PDEs submitted by PACE Programs.

**Edit 817:** The Gap Discount Plan Override Code is invalid. Must be equal to blank in PDEs submitted by PACE Programs.

**Edit 832:** NPI number not found on CMS NPI table; however it contains a valid check digit.

**Edit 843:** OAP Indicator must be blank.