

**Sent:** Monday, April 19, 2021 2:35 PM  
**Subject:** (State Technical and Rebate Contacts) CMS MDP File Format Clarifications / SDUD Test Files

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear State Technical and Rebate Contacts:

We have recently received inquiries requesting further clarification on the forthcoming MDP file formats, and we want to share our responses to ensure that all of our stakeholders receive the same information.

### **SDUD ‘Delete Flag’ Clarification**

In our October 27, 2020, email, we introduced the CMS-R-144 ‘Delete Flag’ (which is applicable only to the SDUD submission and not the State Invoice) and provided additional clarification in our December 17, 2020, email to states.

To further clarify, per *Section 8.3.5 Deleting Existing State Utilization Records*, of the Medicaid Drug Rebate Data Guide for States, if a state would like to delete an existing FFSU or MCOU utilization record, they must submit an adjustment record that contains a value of zero in ALL the following fields:

- Units Reimbursed
- Rebate Amount Claimed
- Number of Prescriptions
- Medicaid Amount Reimbursed
- Non-Medicaid Amount Reimbursed
- Total Amount Reimbursed

With our new MDP system, we opted for using a ‘Delete Flag’ to delete a record, in lieu of the state having to zero-out the specified fields. We received and responded to the following inquiries:

- *Can you please provide some direction on when the ‘Delete Flag’ should be applied in the SDUD file? For example, should it only be used when a record on a previous file had utilization and now all utilization has been reduced to zero?* Correct. The ‘D’ is only used to delete an entire record.
- *Will CMS continue to accept zeroed-out records with the ‘Delete Flag’ set to ‘D’?* No. We would advise the state to no longer zero-out fields when attempting to delete records, and instead, use the ‘D’ flag to delete records.
- *Will CMS accept zeroed records without the “D” flag?* No, the MDP system will return error messages if the fields are all zeroed-out.
- *Should the Delete flag be set to ‘D’ only in special circumstances, e.g., when retroactively trying to correct an NDC that was previously eligible, but now isn’t.* Per first bullet above, the ‘Delete Flag’ is used to delete an entire record.

### **Counted vs. Implied File Format Decimals**

For all of our updated State and Manufacturer MDP file formats, the decimal will no longer be implied, but will be present and counted as a digit, e.g., the updated 15-digit URA will be 99999999.999999, 15 digits total, including the decimal.

## **State MDP Test Files**

With MDP, .CSV files will now be accepted in addition to traditional .TXT files, and states will be required to upload their files directly into the MDP system, since Electronic File Transfer (EFT) will no longer be utilized. Originally, CMS did not intend to create state test URA, UROA, and Quarterly AMP files, and had planned to just open-up our MDP test environment for states to practice uploading the sample SDUD files that they create. However, due to popular demand, we are now planning to create URA, UROA, and Quarterly AMP test files, which should be available to states by early May. States will be able to use these files to test their state systems to ensure they will be able to accept our new file formats when MDP goes live this summer.

As mentioned, we plan to make the MDP test environment available to states so that the states can upload the SDUD files that they have created. (CMS will not be providing a sample SDUD file as each state needs to ensure that it can generate a utilization file in the new file format.) CMS will provide states with additional information when plans for this testing opportunity are finalized.

As a reminder, all of the current and future MDP file formats, along with all the corresponding MDP state/manufacturer emails, are posted to Medicaid.gov at: <https://www.medicaid.gov/medicaid/prescription-drugs/medicaid-drug-rebate-program/medicaid-drug-rebate-program-medicaid-drug-program-file-formats-data-definitions-and-communications/index.html>.

Sincerely,  
CMS MDR Operations

The information in this response is limited to and based upon the facts described in this email and any attachments provided and our understanding of the facts as described in the emails and attachments submitted. If a subsequent review by CMS, by the Office of Inspector General, or another authorized government agency determines or reveals that additional adjustments or revisions are necessary, the manufacturer is responsible for complying with that determination. This response cannot be considered an advisory opinion under section 1128D(b) of the Social Security Act, since only the Inspector General of the U.S. Department of Health and Human Services has been authorized to issue advisory opinions relating to health care fraud and abuse under that section. This response should not be interpreted as acquiescence by the Government to the arrangements described herein. Further, this response is not a release of any liability.