

DEPARTMENT OF HEALTH & HUMAN SERVICES  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard  
Baltimore, Maryland 21244-1850



**CENTER FOR MEDICARE**

---

**DATE:** September 17, 2024

**TO:** Programs of All-inclusive Care for the Elderly (PACE) Organizations

**FROM:** Vanessa Duran, Director, Medicare Drug Benefit and C&D Data Group  
Jennifer R. Shapiro, Director, Medicare Plan Payment Group

**SUBJECT:** Discontinuation of the “Dual-Eligible PACE TrOOP Calculator,” Beginning Contract Year 2025

The purpose of this memorandum is to inform Programs of All-inclusive Care for the Elderly (PACE) Organizations that the Centers for Medicare & Medicaid Services (CMS) will no longer update the “Dual-Eligible PACE TrOOP Calculator” (PACE calculator) beginning with dates of service starting January 1, 2025. CMS has historically maintained and posted the PACE calculator to assist PACE organizations (POs) that do not use the Automated True Out-of-Pocket (TrOOP) Balance Transfer (ATBT) process to coordinate with other Part D sponsors. Currently, POs use the PACE calculator to compute TrOOP costs for dual-eligible participants who transfer to another plan during the same contract year.<sup>1</sup>

Beginning with dates of service January 1, 2025, POs will track and maintain participant TrOOP values in “real-time” in order to populate newly required fields in the Prescription Drug Event (PDE) record.<sup>2</sup> The expanded PDE file layout includes a field entitled “True Out-of-Pocket Accumulator” (TrOOP Accumulator) which will be used by all Part D plan sponsors, including POs, to capture updated TrOOP values beginning with CY 2025.<sup>3</sup> CMS will produce manufacturer invoices for the Manufacturer Discount Program using data populated by Part D plan sponsors in the TrOOP Accumulator field on the PDE.

When a beneficiary leaves a PACE organization, the PO will be able to place the value from the True Out-of-Pocket Accumulator field on the departing beneficiary’s Explanation of Benefit (EOB) form; the beneficiary will be able to present the EOB to the new plan thus obviating the need for the PACE calculator. Therefore, guidance around the PACE calculator included in Chapter 14 of the Medicare Prescription Drug Benefit Manual will no longer apply beginning with calendar year 2025.

---

<sup>1</sup> For TrOOP calculator information, see [Medicare Prescription Drug Benefit Manual](#), Pub. 100-18, ch. 14 and App. D (Aug. 2018).

<sup>2</sup> See May 3, 2024 memorandum, “[2025 Prescription Drug Event \(PDE\) Record Reporting Instructions for PACE Organizations](#)”

<sup>3</sup> See March 8, 2024 memorandum, “[2025 Prescription Drug Event \(PDE\) File Layout Updates for all Part D Plan Sponsors, and Additional 2025 Changes to PDE Reporting for PACE Organizations](#)”

CMS continues to encourage, but not require, POs to use the ATBT process. As a reminder, Appendix D – PACE Addendum Guidance of Chapter 14 of the Medicare Prescription Drug Benefit Manual instructs POs electing NOT to participate in the ATBT process to contact the Part D Transaction Facilitator at [TBTSupport@relayhealth.com](mailto:TBTSupport@relayhealth.com) and request an exclusion from the ATBT process. A list of all POs excluded from this process can be found on the following Part D Transaction Facilitator (PDTransFac) website: <https://medifacd.mckesson.com/fir/>. Those organizations will collect TrOOP-related data via the beneficiary's most recent EOB or the Non-Participating PACE organization Accumulator Balance Transfer Form (which can be found at the previously mentioned PDTransFac website). To assist POs with collecting TrOOP-related data, all current ATBT contact information can be found at the following CMS website: <https://www.cms.gov/medicare/coverage/prescription-drug-coverage-contracting/part-d-contacts>.

Please submit questions about PACE calculator changes to [PACEDPartDPayment@cms.hhs.gov](mailto:PACEDPartDPayment@cms.hhs.gov).

Thank you.