

NewsBREAK | April 5

CMS Issues Final Part D Bidding Instructions for 2024

- On April 4, 2023, the Centers for Medicare and Medicaid Services (CMS), published the Final Contract Year (CY) 2024 Part D Bidding Instructions (Bidding Instructions).
- The HPMS formulary submission window will open this year on May 15, 2023, and close at 11:59 pm PDT on June 5, 2023. CMS must receive a successfully submitted and validated formulary submission by June 5, 2023, for the formulary to be considered for review. Failure to submit and link a formulary to each plan that uses a formulary by the deadline may result in denial of that bid submission.
- Instructions for Implementation of Part D IRA Provisions Effective 2024:
 - For CY 2024, CMS will require Part D sponsors to apply consistent enrollee cost sharing for covered insulin products starting with first dollar coverage (i.e., no deducatible applies) through to the catastrophic phase of the benefit.
 - Covered insulin products and ACIP-recommended adult vaccine costs will be considered separately for purposes of actuarial equivalence testing.
 - Part D sponsors may place covered insulin products and ACIP-recommended adult vaccines on any tier and apply utilization management strategies (e.g., prior authorization and step therapy) consistent with the requirements of CMS formulary review.
- CMS continues to encourage Part D sponsors to provide feedback on several annual programmatic policies, including how CMS should:
 - (1) Define PDP meaningful difference to ensure a substantial difference exists between basic and enhanced benefit plans offered by a parent organization in a PDP region.
 - (2) Set non-defined standard cost-sharing thresholds.
 - (3) Define parameters for an enhanced benefit plan under the Part D redesign.

Please send comments related to these policies to PartDBenefits@cms.hhs.gov with the subject line "CY 2025 Part D Redesign" before June 5, 2023.

See the Bidding Instructions for additional details.

More on This Topic

- Bidding Instructions
- HPMS

For questions, please reach out to <u>Tyler Thorne</u>.

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