



## CMS issues Memo on Pharmacy Price Concessions

- On Nov. 6, 2023, the Centers for Medicare and Medicaid Services (CMS) issued a memorandum titled Application of Pharmacy Price Concessions to the Negotiated Price at the Point of Sale Beginning Jan. 1, 2024 (Memo).
- CMS is reminding Part D sponsors of new rules requiring the application of all pharmacy price concessions to the negotiated price at the point of sale (POS). The negotiated price must reflect the lowest possible reimbursement a network pharmacy will receive for a drug and include all pharmacy price concessions. This guidance applies in all phases of the Part D benefit, including the coverage gap.
- CMS noted that the prompt payment requirements will continue to apply. CMS will monitor to ensure that Part D beneficiaries continue to have access to pharmacies and medications.
- For any pharmacy price concessions not assessed at the claim level, Part D sponsors must attribute the concessions to the claim level to remain in compliance.
- Effective Jan. 1, 2024.

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More on This Topic:

- [Final Rule](#) (CMS-4192-F)
- [Memo](#)

For questions, please reach out to [Vicky Jucelin](#).

AMCP | 675 North Washington Street, Suite 220 | Alexandria, VA, 22314

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