



NewsBREAK | June 5

CMS Issues Reminder of Regulatory Requirements for Pharmacy Price Concessions

- On June 2, 2023, CMS issued a memo via HPMS reminding plan sponsors of requirements related to the pharmacy price concessions provisions in the May 9, 2022 final rule (CMS-4192-F).
- All pharmacy price concessions must be applied at the point of sale and reported to CMS.
- If the pharmacy receives a post-point-of-sale payment from the plan for good performance, then that payment amount must be reported as a negative direct and indirect remuneration (DIR) amount.
- PBM-retained pharmacy price concessions must be reported as non-benefit expense (NBE).
- The negotiated price reported on the PDE record must reflect the lowest possible reimbursement for the network pharmacy.
- Effective January 1, 2024.

See the HPMS memo for additional details.

More on This Topic

- [HPMS memo](#)
- [Final Rule](#) (CMS-4192-F)

For questions, please reach out to [Tyler Thorne](#).

