

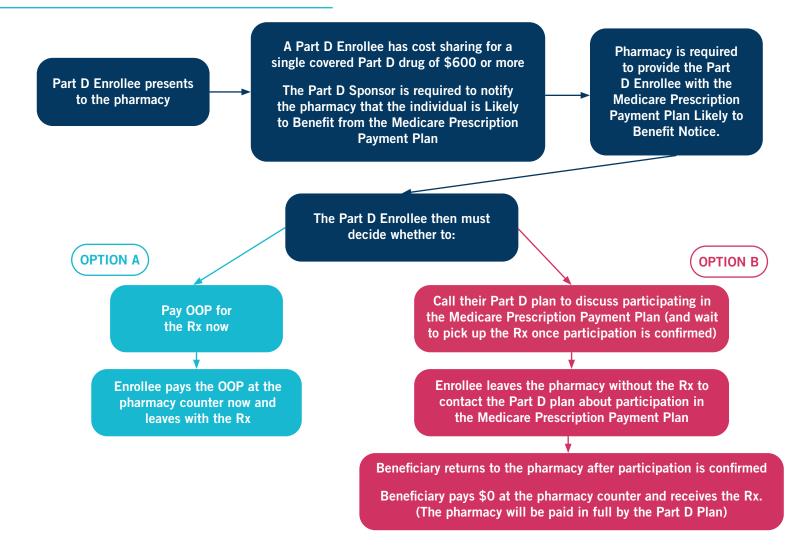


# **MEDICARE** PRESCRIPTION PAYMENT PLAN

The Inflation Reduction Act (IRA) requires Medicare drug plans to offer the option to pay out-ofpocket drug costs in monthly payments instead of all at once to the pharmacy.

- The Medicare Prescription Payment Plan is OPTIONAL (patients must opt-in) and effective January 1, 2025.
- Program participants will pay \$0 to the pharmacy for covered Part D drugs.
- Part D plan sponsors will then bill participants monthly for any cost-sharing they incur while in the program.
- The Part D sponsor will pay the pharmacy in full per Part D prompt payment requirements (see below).
- Not all patients will benefit from the program. Patients with high cost-sharing earlier in the calendar year are more likely to benefit from the program.
  - » Patients with low, stable drug costs will not likely benefit from the Medicare Prescription Payment Plan.
- This payment option might help manage monthly expenses but doesn't save money overall or lower drug costs.

## **Requirements for Pharmacies at the Point-of-Sale**



### **Special Circumstances**

### Long-Term Care Pharmacies

• The pharmacy should provide a Likely to Benefit Notice at the time of the typical cost-sharing billing process.

# Indian Health Service / Tribe & Tribal Organization / Urban Indian Organization (I/T/U) Pharmacies

- Part D prescription cost-sharing is not collected at POS at I/T/U pharmacies.
- The Part D sponsor is not required to notify the pharmacy if the patient is Likely to Benefit; the pharmacy is not required to provide the patient Likely to Benefit Notice.

Other pharmacy types without in-person encounters (e.g., mail order)

• The pharmacy must notify the patient via phone or other preferred contact method

### Pharmacies are NOT Required To Provide:

- Likely to Benefit Notice in any language other than English or Spanish
- Additional counseling to the patient on the payment option
- Financial information to the patient
- Likely to Benefit Notice in December

### Pharmacy Process for Patients Already Enrolled in the Program

- 1. Pharmacy submits claim using Part D plan's primary BIN/PCN.
- 2. Pharmacy receives paid claim response identifying the plan's Medicare Prescription Payment Plan BIN/PCM along with any known other health insurance (OHI).
- 3. Pharmacy submits the claim to OHI before billing the Medicare Prescription Payment Plan.
- 4. Pharmacy processes the Medicare Prescription Payment Plan transaction.
- 5. Pharmacy receives paid claim response reflecting \$0 cost-share at the POS.

#### **Reprocessing Claims for New Participants**

Note: The date of service on the primary Part D claim and additional program-specific transactions must be on or after the date of program effectuation

- 1. The patient receives confirmation of participation in the Medicare Prescription Payment Plan and returns to the pharmacy to purchase the prescription.
- 2. Only the prescription that triggered the notification must be reversed and reprocessed.
- 3. If the patient has other prescriptions with earlier dates of services not yet paid for / picked up, the pharmacy must only reverse and reprocess these prescriptions at the participant's request.
- 4. Part D claims already paid by the patient do not require reprocessing.

### Part D Plan Sponsor Payments to the Pharmacy

- Pharmacies will not collect cost-sharing amounts at POS for participants enrolled in the Medicare Prescription Payment Plan.
- The Part D sponsor will pay the participant cost-sharing amount in addition to the Part D sponsor's portion of the payment and meet prompt pay requirements.
- Per the prompt pay provision, pharmacies must be made whole within 14 days for electronic claims and no later than 30 days for other claims.
- Costs incurred from processing these claims or otherwise related to the program are considered allowable pharmacy costs associated with the dispensing fee of a covered Part D drug.
- CMS is prohibited from requiring Part D sponsors to pay pharmacies additional fees related to the Medicare Prescription Payment Plan.



