

CMS Response to Public Comments Received for CMS-10142

The Centers for Medicare and Medicaid Services (CMS) received the following comments related to CMS-10142. This is the reconciliation of the comments.

Comment:

The commenter points out that the Coverage Gap Discount amount should be subtracted from allowed costs on Worksheet 1 of the CY2025 Part D BPT to ensure that it is not included in the net plan paid amount.

Response:

CMS appreciates the comment and agrees with the plan sponsor's assessment. This correction will be included in the CY2025 Part D Bid pricing tool released in February for Beta Testing.

Comment:

The commenter points out that Payment Modernization Model (PMM) is no longer active for CY2025, and therefore the PMM indicator on Worksheet 1 of the CY2025 Part D BPT should be removed.

Response:

CMS appreciates the comment and agrees with the plan sponsor's assessment. This correction will be included in the CY2025 Part D Bid pricing tool released in February for Beta Testing.

Comment:

The commenter is asking for clarification as to whether a plan is allowed to set a maximum-out-of-pocket (MOOP) value at less than the \$2,000 limit.

Response:

This comment is out of scope for CMS-10142 which addresses the Bid Pricing Tools and Bid Instructions. All benefit-related questions should be directed to the appropriate mailbox.

Comment:

The commenter points out that the CY2025 BPT that was posted for the 60-Day PRA package uses a fixed 60% to calculate the net plan paid above MOOP. They further state that for post MOOP claims where the manufacturer is specified and/or specified small and pays reduced discounts, the plan pays the difference.

Response:

CMS appreciates the comment and agrees with the plan sponsor's assessment. This correction is included in the 30-Day package and is consistent with the BPT mockup presented on the November Actuarial User Group Call.

Comment:

The commenter is asking for clarification as to whether the standard plan cost share or the actual plan cost share from an enhanced, basic alternative or wrap plan will accrue towards beneficiaries' MOOP for plan year 2025.

Response:

This comment is out of scope for CMS-10142 which addresses the Bid Pricing Tools and Bid Instructions. All benefit-related questions should be directed to the appropriate mailbox.