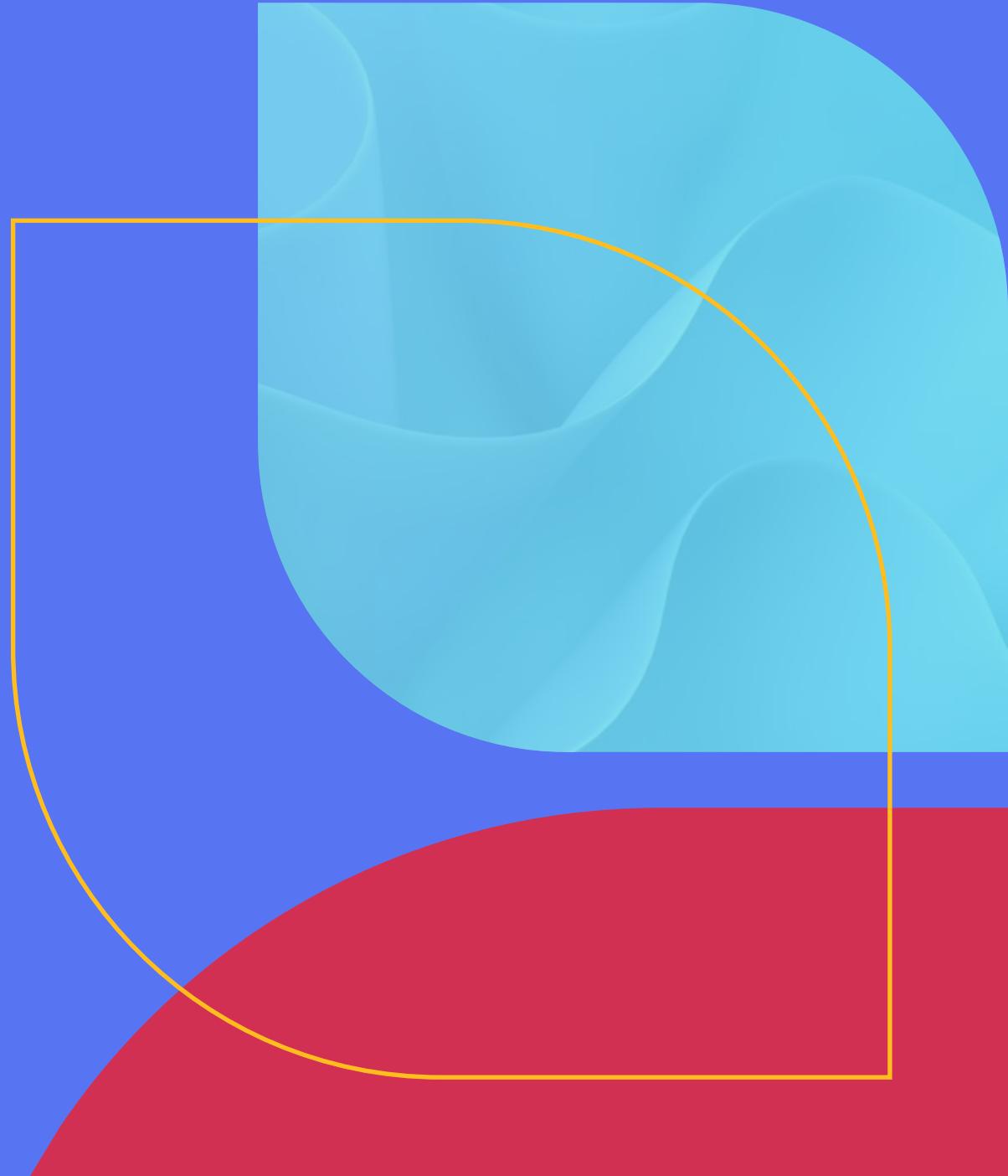




2026 Medicare MFP & MTF

December 2025



Maximum Fair Price (MFP)

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- Impact on Pharmacy Reimbursement
- Contractual Obligations
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- Patient Communication
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Maximum Fair Price (MFP)



Overview of Maximum Fair Price (MFP)



Maximum Fair Price

Purpose of Medicare Drug Price Negotiation (MDPN) Program

CMS setting MFP aims to reduce prescription drug costs and out-of-pocket expenses for Medicare Part D beneficiaries

starting January 1, 2026

CMS Price Negotiation

CMS negotiated ceiling prices for selected high-cost drugs under Part D for Medicare Advantage plans and PDPs.

Stakeholder Coordination

Effectuation of MFP requires additional coordination among Part D plan sponsors, PBMs, **Part D network pharmacies**, and CMS for compliance.

Operational Readiness

Understanding the program's scope and timeline is critical for strategic planning and operational readiness.

Inflation Reduction Act (IRA) 2022:

✓ Grants CMS authority to negotiate the MFP that **Medicare Part D Plan Sponsors** or beneficiaries will pay for certain prescription drugs

✓ Requires manufacturers to make the MFP available

2026 CMS negotiated drugs and Maximum Fair Price (MFP)



Drug	Class	CMS Negotiated Price
Eliquis	Anticoagulants	\$231
Xarelto	Anticoagulants	\$197
Imbruvica	Blood Cancer	\$9,319
Enbrel	Autoimmune Agents	\$2,355
Stelara	Autoimmune Agents	\$4,695
Januvia	DPP-IV Agents	\$113
Entresto	Heart Failure Agents	\$295
Novolog / Fiasp	Insulin – Rapid Acting	\$119
Jardiance	SGLT-2 Agents	\$197
Farxiga	SGLT-2 Agents	\$179



2026: CMS negotiated MFPs for 10 Part D drugs



2026: Prime standard formularies do not include Stelara



2027: CMS removing 3 of the 2026 MFP drugs

- Entresto
- Stelara
- Xarelto

CMS will continue to negotiate drug prices through 2029 and beyond



2026

Initial 10 Part D
drugs

2027

+15 Part D drugs

2028

+15 drugs
covered under
Part D or Part B

2029

+20 drugs
covered under
Part D or Part B

MFP Pharmacy Reimbursement

At Point of Sale (POS):

- Reimbursed at MFP rate + dispensing fee from Prime

Through Medicare Transaction Facilitator (MTF):

- Refund payments from manufacturers to **dispensing entities** if acquisition costs exceed MFP
- 14-day prompt refund commitment

CMS Guidance

CMS released memo on 8/25/25 stating “we expect Part D plan sponsors’ dispensing fees to sufficiently compensate **network pharmacies** so that enrollees can be assured network access to selected drugs”

CMS established MTF

To expedite data exchange and manufacturer refund payments to **dispensing entities**



Pharmacies will be reimbursed to their drug acquisition costs + dispensing fee



Prime is providing higher dispensing fees for 2026 CMS negotiated drugs

- **\$10/retail script and**
- **\$30/LTC script**

Maximum Fair Price

Prime

As part of your respective **Participation Agreement** and **Prime's Provider Manual**, pharmacies are required to abide by all applicable federal and state laws, including those requirements associated with the Medicare Drug Price Negotiation Program.

CMS

In the **Contract Year 2026 Part C&D Final Rule**, CMS finalized the proposal that Part D sponsors' network participation agreements with contracting pharmacies, including any contracts with first tier, downstream, and related entities, must require such pharmacies to be enrolled in the Medicare Drug Price Negotiation Program.

Part D network pharmacies are required to participate in the Medicare Drug Negotiation Program per

- ✓ **Prime agreements**
- ✓ **CMS Final Rule**

Maximum Fair Price

System Updates for MFP

Prime's claims processing systems have been updated to support new MFP pricing logic and dispensing fees.

Compliance and Reporting Enhancements

Prime's reporting mechanisms have been enhanced to meet CMS audit and compliance standards.

Staff Training and Collaboration

Prime has trained operational staff on new procedures and collaborated with vendors to ensure smooth operational transitions.



Prime's standard claim response will reflect the MFP



Prime's claim response for MFP drugs calculates the estimated refund using Standard Default Refund Amount = WAC - MFP

Code	Field	Meaning
61	548-6F	Claim eligible for Medicare Drug Price Negotiation Program for MFP
46	522-FM	Basis of Reimbursement Determination = MFP (Maximum Fair Price)

Maximum Fair Price

Updated Coverage Documents

Part D plans updated Evidence of Coverage and Annual Notice of Change documents to reflect pricing changes clearly.

Medicare Plan Finder

Updated with MFP for 2026 since October 1, 2025



Pharmacies do not need to provide additional communication or materials regarding MFP



Continue to provide the standardized CMS-10147 notice to beneficiaries:

- Version effective through December 31, 2027 must be in use (renewed by CMS on February 11, 2025)

Maximum Fair Price Resources

Dedicated Medicare Drug Negotiation webpage:

[Medicare Drug Price Negotiation Program | CMS](#)

CMS site contains:

- Guidance and policy documents
- Selected drugs and negotiated prices
- Public engagement events
- Medicare Transaction Facilitator general resources
- Pharmacy and Dispensing Entity resources



For general questions about the Medicare Drug Price Negotiation Program, e-mail CMS at

IRARebateandNegotiation@cms.hhs.gov

Medicare Transaction Facilitator (MTF)



Medicare Transaction Facilitator

The MTF system is a core component of implementing the Medicare Drug Price Negotiation Program.

It is a centralized system established to meet the need for a new data and payment exchange in the pharmaceutical supply chain:

- A direct connection for **dispensing entities** and manufacturers to exchange data and payments

It consists of two modules:

1. MTF Data Module (DM):

- **Mandatory** for manufacturers and **dispensing entities**
- Handles claim-level data exchange to support MFP reimbursement

2. MTF Payment Module (PM):

- Optional for **dispensing entities**
- Manages refund payments to **dispensing entities** if acquisition costs exceed MFP



CMS does not charge dispensing entities any fees to use the MTF DM or MTF PM systems

Medicare Transaction Facilitator

Prime

As part of your respective **Participation Agreement** and Prime's **Provider Manual**, pharmacies are required to abide by all applicable federal and state laws, including those requirements associated with the Medicare Drug Price Negotiation Program's Medicare Transaction Facilitator DM.

CMS

In the **Contract Year 2026 Part C&D Final Rule**, CMS finalized the proposal that Part D sponsors' network participation agreements with contracting pharmacies, including any contracts with first tier, downstream, and related entities, must require such pharmacies to be enrolled in the Medicare Drug Price Negotiation Program's MTF DM, and that such pharmacies certify the accuracy and completeness of their enrollment information in the MTF DM.

Part D network pharmacies are required to participate in the MTF DM per

✓ **Prime agreements**

✓ **CMS Final Rule**

MTF Enrollment Timeline



Late Enrollment

The MTF DM will have the capacity to process claims for pharmacies and other dispensing entities that are not yet enrolled. However, please note that late enrollment will likely result in payment delays when receiving applicable MFP refund payments.

[Enroll at Pharmacy and Dispensing Entity Resources | CMS](#)

Pharmacy and Dispensing Entity Resources

MEDICARE
TRANSACTION
FACILITATOR

Welcome to the Pharmacy and Dispensing Entity (DE) Resources page for the Medicare Drug Price Negotiation Program. Pharmacies and other dispensing entities ("dispensing entities") can use the information described below to prepare for the January 1, 2026 implementation of the Medicare Drug Price Negotiation Program, the date the negotiated maximum fair prices (MFPs), for the first ten drugs selected for negotiation covered by Part D go into effect.

Click
Here

[MTF Data Module \(DM\) Enrollment is Now Open!](#)



Pharmacies and other dispensing entities should enroll as soon as they are ready to ensure that they are prepared for MFP effectuation on January 1st.

Source: CMS FAQ MTF Pharmacies and Other Dispensing Entities

Why enroll in the MTF DM?

Pharmacies gain access to the system that facilitates receipt of MFP refund payments from manufacturers to accompany reimbursement from Part D plans.

Pharmacies can self-identify as anticipating facing material cashflow challenges – manufacturers are mandated to include processes to mitigate cash flow challenges.

Do I need an invitation from CMS to enroll in the MTF DM?

Pharmacies and other dispensing entities interested in enrolling in the MTF DM do not need an invitation to enroll in the MTF DM.

Do I also need to enroll in the MTF Payment Module (PM) in order to receive MFP refund payments?

No, dispensing entities do not have to enroll in the MTF PM. After enrolling in the MTF DM, the information provided by the dispensing entity is available to the MTF PM to facilitate the MFP refund payment process with no further action needed from the pharmacy.

Do I need to submit a claim for reimbursement through the MTF DM?

No, the MTF DM is designed to draw on existing claims data flows to minimize the operational burden on dispensing entities.



The MTF DM user interface will serve as a single point of access to assist dispensing entities in the MFP effectuation process.

Dedicated Medicare Drug Negotiation webpage: Pharmacy and Dispensing Entity Resources | CMS

Fact Sheet & Frequently Asked Questions (FAQ)

The Pharmacy and Dispensing Entities Resources Fact Sheet and FAQ document details key information for **pharmacies and other dispensing entities** that will engage with the new MTF system

[Medicare Transaction Facilitator: Fact Sheet for Pharmacies and Other Dispensing Entities \(PDF\) \(April 7, 2025\)](#)

[Medicare Transaction Facilitator: Pharmacies and Other Dispensing Entities Frequently Asked Questions \(December 2025\) \(PDF\)](#)

MTF Resources and Support

For MTF Help Desk application and technical support, visit the [MTF Help Desk](#)

Toll-Free: 877-683-4457 (877-MTF-4HLP)

Email: MFPMedicareTransactionFacilitator@cms.hhs.gov

Resource examples include:

- MTF User Guide
- MTF 835 Companion Guide
- MTF Background and Enrollment Launch Event Recording
- Step-by-step Dispensing Entity Enrollment Process Video
- Step-by-step Third-party Support Entity (TPSE) Enrollment Process Video



CMS is the entity responsible for the MTF systems and support



Prime is unable to troubleshoot and provide MTF system support

Source: Prime MFP & MTF webinars December 22 & 29, 2025

Does this reimbursement rule apply to Tricare and Medicaid?

No, only applies to Medicare Part D

Reimbursement will not be based on AWP-% ?

Correct, reimbursement for the 10 2026 CMS drugs will be based on MFP + dispensing fee

Did CMS set the dispensing fee amount?

No, CMS released memo on 8/25/25 stating only that “we expect Part D plan sponsors’ dispensing fees to sufficiently compensate network pharmacies so that enrollees can be assured network access to selected drugs”

Does Prime dispensing fee apply to claims going through ESI contracts?

Yes

If there's a discrepancy in price reimbursement do we call Prime or ESI?

Neither – dispensing pharmacies will manage all disputes through the MTF DM

Does the pharmacy have to submit actual acquisition cost with the claim? If not, how will estimated refund be calculated?

No, Prime's claim response for MFP drugs calculates the estimated refund using Standard Default Refund Amount = WAC - MFP

On cash flow issue: are the dispensing pharmacies expected to pay the wholesale/ manufacturer before the reimbursement comes in?

Manufacturers can use a prospective model (MFP at point of distribution), a retrospective (refund), or a hybrid model

Pharmacies that self-identify as anticipating facing material cashflow challenges can access manufacturers mitigation processes

Thank you

