

HPMS E-Mail

Date: May 30, 2025

Subject: CMS Plan Benefit Package (PBP) Update - Rx Insulin Cost-Sharing Validation

CMS has released the following PBP update at noon on Friday, May 30th:

PBP Section Rx:

- Prior to this update, the PBP was validating insulin cost sharing by comparing it against the non-insulin cost sharing at the tier level. When non-insulin cost sharing is entered as 0% coinsurance, the system was automatically setting the insulin copay to \$0.
- With this update, the PBP has been modified to omit the insulin vs. non-insulin cost sharing validation when the non-insulin tier uses a "lesser of"/"greater of" cost sharing structure. This change allows for the appropriate flexibility in data entry.
- All plans that use a "lesser of/greater of" Rx cost-sharing structure should review and revalidate their insulin data entries in the CY 2026 PBP.

Plans must continue to comply with the insulin cost share requirements, consistent with § 423.100 and 423.120(h), which state that the cost sharing will not exceed the lesser of (1) \$35; (2) an amount equal to 25 percent of the maximum fair price established for the covered insulin product in accordance with part E of subchapter XI, or (3) an amount equal to 25 percent of the negotiated price, as defined in § 423.100, of the covered insulin product under the prescription drug plan or MA-PD plan.

For questions, please contact Part D Benefits (partdbenefits@cms.hhs.gov).

For technical assistance, please contact the HPMS Help Desk at either 1-800-220-2028 or hpms@cms.hhs.gov.