

CMS Releases the Final Medicare Part D DIR Reporting Requirements for 2016

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On Friday, June 23, 2017, CMS released the [Final Medicare Part D DIR Reporting Requirements for 2016](#). Part D sponsors may begin submitting their DIR information on June 30, 2017 and must finish their submissions by the end of July 31, 2017. As explained in our earlier [post](#), CMS publishes Part D DIR Reporting requirements each year and sets the deadline for DIR submissions.

These DIR Reporting Requirements are the first to require Part D plan sponsors to report as DIR price concessions from and additional contingent payments to network pharmacies that could not reasonably be determined at the point of sale. This change is caused by the update to the definition of "negotiated prices" that was effective January 1, 2016. Not surprisingly, most of the comments and responses included in CMS's Reporting Requirements focus on this change. Additional topics addressed in the comments and responses include, but are not limited to: (i) plan sponsors no longer being able to report negative amounts in the rebate fields, (ii) the timeliness of the DIR data submitted by July 31, 2017; and (iii) confidentiality of DIR data reported to CMS.

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Tara advises managed care organizations, pharmaceutical services providers such as PBMs, and integrated delivery systems, and companies that invest in them, on matters relating to compliance with federal health care program regulations, federal and state fraud, waste and abuse laws and plan benefits.