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**To:** All Participating Pharmacies **From:** Pat Monaco, CEO and Ron Lanton,  
Legislative Policy Advisor

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**Date:** February 16, 2024 **Pages:** 2

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**RE: PBM DIR Payment Plan Info**

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NPSC's CEO Patricia Monaco and NPSC's General Counsel and Legislative Policy Advisor Ron Lanton, composed a December 7, 2023 letter to the Centers for Medicare and Medicaid Services (CMS) expressing our serious concerns about pharmacy network adequacy with the upcoming January 1, 2024 DIR rule changes. We also requested that CMS grant NPSC's participating pharmacies alternative methods to pay for excessive DIR fees, while proposing some policy ideas to do so.

CMS then provided NPSC with a lengthy January 25, 2024 response, which surprisingly suggested that we reach out to all pharmacy benefit managers to arrange payment plans. While CMS has not stated anything definitive publicly about a payment plan, the letter stated the following:

*"In your letter, you noted that Part D plans have yet to offer payment plans. If you have a specific example of a pharmacy requesting a payment plan from a PBM or Part D sponsor and the pharmacy has not received an adequate response, please report the details of the request to [PartD\\_Monitoring@cms.hhs.gov](mailto:PartD_Monitoring@cms.hhs.gov)."*

CMS is definitely taking the position that pharmacies should reach out to inquire about these payment plans, and CMS wants to know via its email address above, whether or not plans are cooperating with this request.

In response, Mr. Lanton on behalf of NPSC, reached out to **Prime Therapeutics**, **Caremark**, **OptumRx** and **Express Scripts** and received the following information from each PBM regarding payment plans for our participating pharmacies that need them.

- **Optum:** Participating pharmacies can reach out to Susan Hines, [susan.hines@optum.com](mailto:susan.hines@optum.com), on the options for a payment plan for DIR.

February 16, 2024

- **Prime Therapeutics:** Contracted pharmacies with questions or concerns about 2023 pharmacy price concessions should reach out to Prime at: [priceconcessions@primetherapeutics.com](mailto:priceconcessions@primetherapeutics.com).
- **Express Scripts:** Please note that Express Scripts explained that they are not collecting DIR for Plan Year 2024. Clients have transitioned to either the Retail Medicare Part D schedule or the Medicare Part D National Performance Network.

For DIR collection for Plan Year 2023, Express Scripts said they “eased potential cash flow issues with pharmacies by collecting DIR throughout the year.” Additionally, Express Scripts did quarterly estimates and performance re-calibrations which in turn limited the annual impact to pharmacies from owing a significant lump sum at year end or during Q1 of 2024.

If you have questions, we recommend sending these questions to: [remittance@express-scripts.com](mailto:remittance@express-scripts.com). That team is best positioned to triage these types of questions. If they cannot answer them directly, they will route them to the appropriate team.

- **Caremark:** CVS Caremark explained that they have sent a February 12, 2024, national communication to its network pharmacies regarding DIR fees. Pharmacies should look at the communication and come back to NPSC if there are questions.

NPSC would like to thank the following organizations for joining us in our December 7, 2023 correspondence to CMS:

Carol Carlson, FPN  
Lanny Dowd, QC Pharmacies  
Kathy Muller, Rx Plus  
Brandon Peiffer, Sav-More Pharmacies  
Steve Finkelstein, Keystone Purchasing Alliance  
Mark Kinney, IPC

Through our connections to these and other organizations in the country, we hope this information helps pharmacies get assistance in paying high DIR fees.

**We are all Stronger Together!**