

Frequently Asked Questions Pharmacies and Other Dispensing Entities

This Frequently Asked Questions (FAQs) document contains information intended to support pharmacies, mail order services, and other dispensing entities as they engage with the new Medicare Transaction Facilitator (MTF). To facilitate the implementation of the negotiated maximum fair prices (MFPs) agreed upon by CMS and participating manufacturers for drugs selected for negotiation, CMS established an MTF system composed of two modules: the MTF Data Module (DM) and the MTF Payment Module (PM). For more information, please see the [MTF Fact Sheet](#). Guidance and other important documents about the Negotiation Program can be found on the CMS website [here](#).

These FAQs will be updated periodically and are organized by topic area. If you do not see the answer to your question within this document, guidance, or additional resources available on the [Pharmacy and Dispensing Entity Resources page](#), please email MFPMedicareTransactionFacilitator@cms.hhs.gov with your question and CMS will provide you with a response or direct you to a relevant resource.

Help Desk and Resources

Q1. Can I speak to someone on the phone regarding my MTF questions?

The MTF Help Desk phone number is 1-877-MTF-4HLP (1-877-683-4457). The hours of operation are 7:00 AM to 7:30 PM ET Monday-Friday, excluding federal holidays.

General & MTF Background

Q2. What is the MTF?

CMS established the MTF to provide the operational infrastructure to facilitate the effectuation of MFPs for drugs selected for negotiation under the Medicare Drug Price Negotiation Program. MFP effectuation is the process by which manufacturers provide pharmacies, mail order services, and other dispensing entities access to negotiated MFPs. The MTF DM is a component of the

MTF that provides the manufacturer with the information necessary to identify and provide MFP refund payments on claims for MFP-eligible individuals as applicable. For more information about the role of the MTF and its applicability to a dispensing entity's business, please view this [short informational video](#). Users can access more information about the MTF and the Medicare Drug Price Negotiation Program on the [Pharmacy and Dispensing Entity Resources page](#) on the Medicare Drug Price Negotiation Program website.

Q3. Why should I enroll in the MTF DM?

The MTF DM is a critical tool for pharmacies as they dispense drugs with negotiated MFPs on or after January 1, 2026. When the negotiated MFPs are in effect (beginning January 1, 2026), pharmacy reimbursement from Part D plan sponsors will be no more than those negotiated MFPs (plus any dispensing fees) which may be less than the acquisition costs pharmacies pay for the drugs.

By enrolling in the MTF DM, pharmacies gain access to the system that facilitates receipt of MFP refund payments from these drugs' manufacturers to accompany their reimbursement from Part D plans, as applicable. Enrolling in and using the MTF DM is free for pharmacies and the act of enrolling itself does not place any requirement on pharmacies to engage in the Part D program or to dispense any drugs under the Medicare Part D program; that is, pharmacies that enroll in the MTF DM retain the ability to make future decisions related to their Part D participation.

Following enrollment, the pharmacy does not need to take any further action with respect to the MTF DM to support data and payment exchange, when necessary, outside of the pharmacy's normal course of doing business (e.g., dispensing the selected drugs, submitting claims to the Part D plan sponsor). Pharmacies may be passive users of the MTF DM after enrollment, with the system supporting their business in the background, or they may actively engage with the system's features (e.g., reporting) to help

monitor their claims processing and MFP refund payments.

Q4. As a dispensing entity, do I have to enroll in the MTF DM? What are the consequences if a dispensing entity does not enroll in the MTF DM?

In the **Contract Year 2026 Part C&D Final Rule**, CMS finalized 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 MTF DM, and that such pharmacies certify the accuracy and completeness of their enrollment information in the MTF DM.

As described in Q2 above, the MTF DM is a critical tool for pharmacies and other dispensing entities as they continue, or begin, to dispense drugs with negotiated MFPs on or after January 1, 2026. Enrolling in the MTF DM does not put any further obligations on a dispensing entity as it relates to the Part D program; for example, there is no obligation to dispense these particular products just because a pharmacy or other dispensing entity has enrolled in the MTF DM. Rather, completing MTF DM enrollment ensures that this system is available if and when any of these selected drugs are dispensed.

MTF DM Enrollment

Q5. 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. To begin the enrollment process, dispensing entity personnel may visit the MTF website any time at <https://mtf.cms.gov>. **Importantly, the 'first user' for each dispensing entity must be the individual listed as the primary point of contact in your pharmacy's information in the National Council of Prescription Drug Programs (NCPDP) Access Online profile.** This helps ensure that only individuals appropriately linked with your pharmacy can establish an account with the MTF DM. Once your 'first user' has an account established, they can invite additional staff from your pharmacy to set up accounts of their own.

Dispensing entities that do not enroll may continue receiving enrollment reminders from CMS; for example, if the MTF DM receives a claim(s) to process from an unenrolled pharmacy, the system will automatically

notify the pharmacy's primary point of contact to encourage prompt enrollment.

Q6. What are the steps of the MTF DM enrollment process?

Enrolling a pharmacy in the MTF DM is a straightforward process using a web-based enrollment form. First, the enrollee (see Q5 for information about each dispensing entity's 'first user') begins by creating an account with the CMS Identity Management system (CMS IDM), unless they already have a CMS IDM account for other CMS programs. This is an important step for the security of the MTF DM, enabling CMS to ensure that only verified and identified users are able to create accounts and access the MTF DM. During this process, the user creates a username and password connected to their verified CMS identity that is used to access the MTF DM.

Next, each enrolling dispensing entity reviews and signs the **MTF DM User Agreement**, outlining the roles and responsibilities of all the parties involved in the MTF DM to facilitate successful and sustainable operations. The MTF DM User Agreement must be signed by an individual authorized to sign on behalf of the entity; this user is known as the Authorized Signatory Official (ASO) within the MTF DM. If the 'first user' is not the ASO, they can invite the appropriate individual to create their own MTF DM account in order to review and sign the User Agreement.

Then, the user completes a standardized enrollment form to provide the information the MTF needs to operate. This includes things like inviting additional MTF DM users for their entity, providing entity demographics, third-party support entity (TPSE) (e.g., a Pharmacy Services Administrative Organization (PSAO)) relationships, and preferences for how the entity will receive MFP refund payments. For more information, the standardized enrollment form ("Dispensing Entity Enrollment Questionnaire") is available for viewing on the **Office of Management and Budget (OMB) website**. Click "all" to see full details.

While completing the enrollment form, the pharmacy user may authorize the MTF DM to use information from the NCPDP Access Online pharmacy database to expedite the process by pre-populating the pharmacy's existing information from their NCPDP profile for review and confirmation. If a dispensing entity chooses not to authorize the use of the NCPDP data, the user can provide all the necessary information manually to complete the enrollment form.

Detailed, step-by-step enrollment instructions are available in the MTF DM User Guide. CMS provides regular updates to this User Guide to maintain currency with all system operations. The User Guide is available for download at the MTF Help Desk under the [resources](#) section.

Q7. What are the various user role types in the MTF DM?

There are four distinct user roles in the MTF DM for dispensing entities and TPSEs:

- **Authorized Signatory Official (ASO):** An appointed individual of the dispensing entity or TPSE with authority to legally bind that organization in agreements, represent the organization in an official capacity, and act on behalf of an organization. To be eligible, the ASO must meet one or more of the following criteria: (1) serve as the Chief Executive Officer (CEO), where the individual has been duly appointed by the organization's board or other governing body; (2) serve as the Chief Financial Officer (CFO), where the individual has been duly appointed by the organization's board or other governing body; (3) serve in a role other than as the CEO or CFO, where the individual has authority that is equivalent to a CEO or CFO; or (4) serve in a role, where the individual has been granted directly delegated authority to legally bind the organization on behalf of one of the individuals previously noted in (1)-(3). ASOs also have the ability to invite additional users to serve any available role in the MTF DM. Each MTF DM enrolled entity is allowed up to three ASOs.
- **Access Manager (AM):** An individual of the dispensing entity or TPSE authorized to act on behalf of the organization to view, modify, submit, and certify the completeness and accuracy of information in the MTF DM on behalf of the organization. AMs also have the ability to invite additional users to serve as Access Managers, Staff End Users, or Remit Developers in the MTF DM. Each MTF DM enrolled entity is allowed up to three AMs.
- **Remit Developer (RD):** An individual, designated by the AM or the ASO of the dispensing entity or TPSE, authorized to use the Common Line Interface (CLI) tool and download 835s on behalf of the organization. Each MTF DM enrolled entity is allowed up to three RDs.

- **Staff End User (SEU):** An individual, designated by the AM or the ASO of the dispensing entity or TPSE, authorized to view information in the MTF DM and submit complaints and disputes in the MTF DM on behalf of the organization. Each MTF DM enrolled entity is allowed up to ten SEUs.

Q8. As a dispensing entity, what information do I need to provide during enrollment?

Users must complete the sections identified in the Dispensing Entity Enrollment Questionnaire (available for viewing on OMB's website; click "all" to see full details).

To leverage information as reported to the NCPDP Access Online pharmacy database (if authorized), pharmacies will first provide identifying information, including: 1) either the legal business name (exactly as it appears in the NCPDP database), 2) doing business as (DBA) name, and 3) NCPDP Relationship ID (for chains, when NCPDP relationship type = 01), or NCPDP Provider ID (for non-chains). This enables the MTF DM to import identifying information, such as name, addresses, National Provider Identifier (NPI), and Federal Tax Identification Number (TIN) for verification. If a user does not authorize the MTF DM to use and rely on information reported to NCPDP, then that user will manually provide all the information identified above.

During enrollment, dispensing entities may also identify TPSEs – for example, a PSAO – to support the entity in either payment and/or remittance receipt and processing. If using a TPSE, the pharmacy will select the correct TPSE and identify the function(s) the TPSE will support (either payment support, remittance support, or both). Following selection, the TPSE will receive an email from the MTF to enroll and set up an MTF DM account, if they have not already. Note that both the pharmacy and the TPSE must enroll in the MTF DM to link the dispensing entity with the correct TPSE, and the TPSE entity must confirm that they are providing the service(s) they have been selected to perform by the dispensing entity using available functionality in the MTF DM user interface.

A dispensing entity may elect to receive MFP refund payments via electronic transfer of funds (EFT) or via paper check. When electing electronic payments (which are recommended to expedite payment processing times), the dispensing entity will provide their banking information and account type. Please note that if a dispensing entity is using a TPSE to process its MFP refund payments, that TPSE's banking information is used for payment facilitation, and the dispensing entity's banking

information is stored in the MTF DM and used as needed in case of unforeseen circumstances that interrupt sending payment to their TPSE. If a pharmacy or dispensing entity chooses to receive MFP refund payments via paper check, the entity will provide the addresses where they wish payment to be sent.

Lastly, pharmacies and dispensing entities need to provide contact information for two points of contact within the dispensing entity who are knowledgeable about its responses to the **Dispensing Entity Enrollment Questionnaire** (click “all” to see full details including any data pre-populated from the NCPDP pharmacy database) and are able to respond to any inquiries from CMS if clarifications or additional information is needed.

Q9. Once a dispensing entity completes MTF DM enrollment, will they receive a certification or confirmation via email?

Upon successfully certifying enrollment, the dispensing entity receives an email notification from MTF DM. A user may also check the status of their enrollment by signing into the MTF DM and navigating to the “DE/TPSE Enrollment” page. Here, “Section 2: Complete Enrollment Form” shows the current status of a pharmacy’s enrollment.

The MTF DM allows the dispensing entity to review and update its enrollment information whenever necessary.

Q10. As a dispensing entity, once I 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.

Q11. Once enrolled, how do I access and use the MTF DM?

Once enrolled, an individual user can use their CMS IDM login to access the MTF DM web-based platform at <https://mtf.cms.gov>. Once logged in, users can manage their accounts and access the various features available within the MTF DM. Dispensing entities can access The User Guide, which provides instructions for navigating the MTF DM via the MTF Help Desk to use the system.

For a user to keep their CMS IDM active, they must log in to the MTF DM every 60 days. Users will get email

reminders to log in from IDM. Please visit the **CMS IDM Help Center** for more information regarding the IDM system, including troubleshooting for expired passwords and other useful guides.

Q12. For dispensing entities with multiple bank accounts, which should they enter into the enrollment application?

This is a business decision that the dispensing entity has to make. However, the MTF system can only support one bank account per enrollment. The instructions in the MTF DM enrollment form (see Section 3) note that if a chain has regional subdivisions or associated store locations that require payments to be deposited into a separate bank account, those entities must enroll separately, entering their respective bank accounts. If the entities are not part of a chain and the user is enrolling each into its own individual profile, then they may enter the corresponding bank account information for that entity in Section 3 of the enrollment form.

Q13. What happens if a pharmacy opts to pre-populate its data in the MTF DM from the NCPDP pharmacy database, but the NCPDP data is incorrect or outdated upon review?

CMS encourages all dispensing entities, especially those who intend to use the NCPDP database to pre-populate information during the enrollment process, to update their information in their NCPDP Access Online profile at least two weeks before beginning the MTF DM enrollment process. Note that the MTF DM receives regular data ingestions from the NCPDP database, so all updates **must be** made directly in the NCPDP Access Online profile. Alternatively, if a user decides not to pre-populate their dispensing entity’s information from NCPDP, they may still manually enter requested data directly into the MTF DM.

If a user notices any information that is outdated or incorrect during the MTF DM enrollment process, that user should return to their NCPDP profile to update their information and then resume their MTF DM enrollment at a later date once that information has been updated.

To review current profile information and make updates, if necessary, users should visit **NCPDP Online**, log into their profile, and follow the steps to make any applicable updates. For help, please contact NCPDP at pharmacyhelp@ncdpd.org.

Q14. How should dispensing entities with multiple NPIs or NCPDP IDs enroll in the MTF DM? How should pharmacies that have multiple locations but no chain code enroll in the MTF DM?

Each NCPDP ID constitutes a unique MTF DM enrollment. That is, if two dispensing entities do not share the same NCPDP ID, they each have to enroll with the MTF DM individually, as they are considered separate businesses in the NCPDP pharmacy database. To the extent that each NCPDP ID (i.e., pharmacy) is associated with the same user, the MTF DM user interface provides functionality to access all applicable pharmacies from a single login; that is, while each pharmacy needs to complete the enrollment process, a user associated with more than one pharmacy only needs one MTF DM login.

For chains, each chain code must enroll in the MTF DM, as the system views each as a distinct dispensing entity for data processing purposes. However, individual pharmacies (i.e., stores) under a chain code do not need to enroll as they will be captured under the chain's central account.

Using Third-party Support Entities (TPSEs) in the MTF

Q15. I use a third-party vendor to support my payment and/or remittance operations. How will this work with the MTF DM?

As part of the MTF DM's functionality, dispensing entities may select a TPSE – for example, a PSAO – to support the dispensing entity in receiving and processing payments and/or remittances. The MTF DM was designed to align with industry standards for central payment and claims reconciliation to ensure a familiar process for TPSEs and dispensing entities. TPSEs can expect to support dispensing entities in much the same manner they do for non-MFP drugs.

If a dispensing entity wishes to select a TPSE, the MTF DM automatically populates TPSEs in a search field available on the enrollment form. TPSEs will appear in the MTF DM as long as they have a validated chain or relationship code in the NCPDP database. Dispensing entities choosing to use a TPSE must enter the TPSE they work with, and the function the TPSE provides (i.e., payment support, remittance support, or both) during

the enrollment process. CMS encourages TPSEs to provide information to their associated pharmacies to facilitate consistent data entry and successful matching in the system.

Dispensing entities should only select a TPSE to support their payments and/or remittance processing with which they have an existing arrangement; the MTF DM enrollment process is not designed to establish new TPSE arrangements.

MTF DM Claims Processing and MFP Refunds

Q16. Does a dispensing entity need to submit claims for reimbursement through the MTF DM?

The MTF DM is designed to draw on existing claims data flows to minimize the operational burden on dispensing entities. Dispensing entities **do not** need to submit claims for reimbursement through the MTF DM. Instead, the MTF DM will leverage claims data that dispensing entities submit to Part D plan sponsors under the normal course of doing business. As described in section 40.4.2 of the [Medicare Drug Price Negotiation Program: Final Guidance for Initial Price Applicability Year 2028 and Manufacturer Effectuation of the Maximum Fair Price in 2026, 2027, and 2028](#) that CMS published on September 30, 2025 (hereafter referred to as “final guidance”), the MTF DM will receive adjudicated Part D claims data for selected drugs from CMS' Drug Data Processing System (DDPS).

Q17. If a dispensing entity is not enrolled in the MTF DM, will claims reject at Point of Service for a selected drug?

The Part D plan sponsor is responsible for adjudicating claims for selected drugs regardless of the MTF DM enrollment status of the dispensing entity. For selected drugs under the Medicare Drug Price Negotiation Program, CMS finalized in the [Contract Year 2026 Part C&D Final Rule](#) that Part D plan sponsors must submit initial Prescription Drug Event (PDE) records within seven calendar days from the date that a Part D plan sponsor (or its contracted first tier, downstream, or related entity) receives the claim. CMS will then use the MTF DM to transmit data to the Primary Manufacturer, as described in section 40.4.2 of [final guidance](#).

Q18. How much should a dispensing entity expect to receive for each MFP refund payment?

As discussed in section 90.2.1 of [final guidance](#), the manufacturer is responsible for making the MFP available to dispensing entities. Given that the statutory obligation to effectuate the MFP rests with the manufacturers, the manufacturers are responsible for calculating the correct MFP refund payment amount for each applicable claim to make MFP available.

CMS' [final guidance](#) noted that manufacturers may provide refunds at the Standard Default Refund Amount (SDRA), which is the difference between Wholesale Acquisition Cost (WAC) and MFP. The SDRA will be based on the WAC as published in pharmaceutical pricing database compendia on the date of service of the Part D claim. Alternatively, manufacturers may provide refunds at an alternative amount, and maintain supporting documentation demonstrating why MFP refund payments were provided at an amount other than the SDRA. CMS will be monitoring MFP refund payments closely and on an ongoing basis to assess the extent to which the MFP is being made available.

As discussed in section 40.4.2.2 of [final guidance](#), during the MFP effectuation process, Part D plan sponsors will provide an estimated MFP refund amount based on the SDRA to dispensing entities for each Part D claim for a selected drug to assist the dispensing entity in tracking the amount of outstanding refunds owed. The SDRA estimate provided by the Part D sponsor may not reflect the final amount that manufacturers provide to make MFP available.

Q19. What should a dispensing entity do if they disagree with the amount of an MFP refund payment that they received from the manufacturer?

If a dispensing entity disagrees with the refund amount received from the manufacturer, as a first action, CMS encourages manufacturers and dispensing entities to work together to mitigate the issue. To facilitate this coordination, CMS requires that manufacturers provide a plan for communicating with dispensing entities regarding such concerns as a component of their MFP effectuation plan. The redacted versions of the MFP effectuation plans, including details on how to reach a manufacturer directly, are available for dispensing entities to review in the MTF user interface under the "Manufacturer Dashboard" segment.

These concerns may also be submitted to CMS via the complaints and disputes portal on the [MTF Help Desk](#) page. In these submissions, CMS requests a detailed description of the issue, supporting documentation (if applicable), and contextual information to aid our review process. For more details on the information CMS collects for a complaint and dispute submission, please see the "Drug Price Negotiation Program Complaint and Dispute Intake Form" available on [OMB's website](#) (click "all" to see full details). The complaints and disputes process is described in section 90.2.2 of [final guidance](#).

Accessing 835s and the Command Line Interface (CLI) Tool

Q20. Where can I find more information on how dispensing entities and their TPSEs will receive claim remittance advice from the MTF DM?

The final 835 Companion Guide is available on the MTF Help Desk [website](#). The final MTF 835 Companion Guide clarifies and specifies the data content when exchanging transactions electronically with the MTF DM. It defines how dispensing entities and their TPSEs will retrieve claim remittance advice from the MTF DM and provides technical and connectivity specifications for the 835 Health Care Claim: Payment/Advice transaction Version 005010. This final MTF 835 Companion Guide contains instructions for electronic communications as well as supplemental information for ingesting/creating transactions while ensuring compliance with the associated Accreditation Standards Committee X12N Technical Report Type 3 and the Council for Affordable Quality Healthcare – Committee on Operating Rules for Information Exchange (CAQH CORE) companion guide operating rules.

Q21. Where can we find and access the 835 test file?

The MTF 835 test files are available on the MTF DM portal for registered MTF DM users with remittance access. Users will be provided with an 835 test file within the 835 section of the MTF DM portal. The test file will be available via the portal or CLI tool. The 835 Companion Guide is available on the [MTF Help Desk](#).

Q22. Where can I find the CLI tool in the MTF DM portal?

The CLI tool is available on the [MTF DM portal](#). This link contains the CLI Tool User Guide and instructional videos.

Q23. Will payments to dispensing entities and accompanying 835 remittances be separated by manufacturer, chain code, or NPI/tax ID?

CMS will minimize the amount of transactions and payments sent to and from the MTF DM and pharmacies, other dispensing entities, and TPSEs.

Payments will be separated based upon a payment-remit combination that will be based on chain code, payment center, and/or remit provider. For example, if payment and remittances are sent to a PSAO that is facilitating a central pay system for numerous independent pharmacies or chains where they are receiving both payment and remit, it would be broken out that way. Or, if the chain level is receiving payment, it would be broken out that way.

Payments and remittances will be aggregated across manufacturers for dispensing entities based upon those combinations. For example, an independent pharmacy that is receiving its own payment and remittance would receive one payment per day that would include all ten manufacturers within that one payment.

Each individual store NPI would be identified in the 2000 loops in the claim details section, and prescriptions would be identified in the 2100 loop, following standard 835 processing.