



## CENTER FOR MEDICARE

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DATE: May 6, 2025

TO: All Part D Sponsors

FROM: Vanessa S. Duran, Director  
Medicare Drug Benefit and C & D Data Group

SUBJECT: Contract Year 2026 Part D Medication Therapy Management Program  
Guidance and Submission Instructions

This memorandum provides instructions to Part D sponsors regarding contract year (CY) 2026 Part D Medication Therapy Management (MTM) programs. All Part D sponsors are required to have an MTM program designed to ensure, with respect to targeted beneficiaries, that covered Part D drugs are appropriately used to optimize therapeutic outcomes through improved medication use, and to reduce the risk of adverse events, including adverse drug interactions. MTM program requirements are codified at 42 CFR § 423.153(d). Sponsors should refer to the HPMS memorandum “*Contract Year 2025 Part D Medication Therapy Management Program Guidance and Submission Instructions*” dated May 6, 2024, which can be found on the CMS Part D MTM webpage at <https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovContra/MTM>, in addition to the information provided in this memorandum.

### **Important Dates and Information for 2026 MTM Program Submissions and Attestations**

Annually, sponsors submit an MTM program description to CMS through the Health Plan Management System (HPMS) for review and approval. CMS evaluates each program description to verify that it meets the current minimum requirements for the program year. The requirements do apply to Employer Group Waiver Plans (EGWPs). These requirements do not apply to MA Private Fee for Service (MA-PFFS) organizations (see 42 CFR § 423.153(e)) or PACE organizations. However, considering that MA-PFFS organizations have an equal responsibility to provide a quality Part D product, CMS encourages MA-PFFS organizations to establish an MTM program to improve quality for Medicare beneficiaries. MA-PFFS organizations that choose to establish an MTM program must follow the same annual submission and approval process.

The CY 2026 MTM program submission deadline is **June 4, 2025**, for all new and renewing Part D sponsors.

Action	Key Date
Release of the CY 2026 MTM Program Submission Module in HPMS	May 21, 2025 11:30am EST
2026 MTM Program Submission Deadline	June 4, 2025, 11:59pm PDT
2026 MTM Program Attestation Deadline	June 18, 2025, 11:59pm PDT

A technical document titled “HPMS CY 2026 MTM Program User Manual” is available for download through the CY 2026 MTM Program Submission module under Documentation in HPMS.

### Annual Eligibility Threshold

Beginning January 1, 2025, per 42 CFR § 423.153(d)(2)(i)(C), the MTM cost threshold is set at the average annual cost of eight generic drugs, as defined at 42 CFR § 423.4, and determined using the prescription drug event (PDE) data specified at 42 CFR § 423.104(d)(2)(iv)(C). Based on analysis of 2024 PDE data, the MTM cost threshold will be \$1,276 for 2026.

### Standardized Format

The current Standardized Format and updated technical instructions are posted on the [CMS Part D MTM webpage](#). The Standardized Format (CMS-10396; OMB control number: 0938-1154) for the comprehensive medication review (CMR) summary was approved by the Office of Management and Budget (OMB) through the Paperwork Reduction Act (PRA) process through December 31, 2027.

### Change Request Submission Process

The HPMS MTM Program Submission module also allows sponsors to submit MTM program change requests during five Update Cycle windows. Please refer to the User Manual available in HPMS. Sponsors may request changes to their CMS-approved program during any the following Update Cycle windows as noted in the “CY 2026 Parts C and D Annual Calendar”:

- September 1 - September 10, prior to the contract year (i.e., before effective date of the approved MTM program),
- December 1 – December 10, prior to the contract year (i.e., before effective date of the approved MTM program). Reminder: This is the last window to make sure your website URL is updated before start of contract year.
- March 1 - March 10, within the contract year (i.e., after implementation date of approved MTM program),
- June 1 - June 10, within the contract year, and,
- September 1 - September 10, within the contract year.

The MTM Program Module submission gates are automatically open during these Update Cycle windows. Sponsors should (1) directly edit the program description in the applicable data entry page(s) and (2) enter information in the Change Request Form Description field(s) to justify the changes to the applicable data entry page(s). In addition, sponsors should submit their re-attestation via the HPMS attestation link as described above.

The Update Cycle window from December 1 to December 10 provides plan sponsors with an opportunity to make sure their website URLs are functioning and meet the website content requirements per 42 CFR § 423.2265(b)(13) for the contract year.

Part D sponsors will receive an email correspondence regarding the approval of the change. Depending upon the volume of requests, plans should expect a response within 30 days. The changes should be implemented within a reasonable time following approval. Sponsors may not adjust their bids based on requested changes to their CMS-approved MTM program.

We encourage sponsors to submit changes during the Update Cycle windows. If your contract needs to make changes to your MTM program outside of these windows or for other questions related to Part D MTM programs, please email [partd\\_mtm@cms.hhs.gov](mailto:partd_mtm@cms.hhs.gov). It is essential to include the contract ID(s) in the email request and the applicable contract year if you are requesting to have the submission gate opened in HPMS. If you have any questions on accessing the HPMS MTM Program Submission module, please contact the HPMS Help Desk at 1-800-220-2028.