



OPPS Drug Acquisition Cost Survey Webinar

December 2025

Welcome



Thank you for joining our **Outpatient Prospective Payment System (OPPS) Drug Acquisition Cost Survey (ODACS)** webinar.

- This session will be recorded and posted.
- Participants can submit questions via the Q&A feature.
- This is approximately a one-hour session with time for questions at the end.

Agenda

Topic	Presenter
Introductory Remarks	TBD, CMS
ODACS Program Overview	Katie Wilder, Contractor
System Overview	Michelle Berman, Contractor
Available Resources and Next Steps	Katie Wilder, Contractor
Q&A Session	Suzanne Bromley, Contractor
Closing Remarks	TBD, CMS

Goals



- Provide an overview of the:
 - OPPS Drug Acquisition Cost Survey initiative
 - Registration process
- Demonstrate how to:
 - Prepare for data collection
 - Access the ODACS Data Collection System
 - Submit drug acquisition cost data to CMS
- Share available resources
- Answer your questions

OPPS Drug Acquisition Cost Survey

1

Executive Order

On April 15, 2025, President Trump signed an [Executive Order](#) that stated: “the Secretary shall publish a plan to conduct a survey under section 1833(t)(14)(D)(ii) of the Social Security Act to determine the hospital acquisition cost for covered outpatient drugs at hospital outpatient departments.”

2

Proposed Rule

On July 17, 2025, CMS issued the [CY 2026 Hospital Outpatient Prospective Payment System \(OPPS\)](#) and [Ambulatory Surgical Center \(ASC\) Payment System proposed rule](#), stating that CMS will conduct a survey of acquisition costs from all hospitals paid under the OPPS by early CY 2026.

3

Final Rule

On November 25, 2025, CMS issued the [CY 2026 OPPS and ASC Final Rule](#), requiring all hospitals paid under OPPS to submit drug acquisition costs for each separately payable drug to CMS.

Data Requested



DRUGS

Separately payable drugs purchased for outpatient use and paid under OPPS at the 11-Digit Outer NDC Level



TIME FRAME

Purchased from July 1, 2024, to June 30, 2025



UNITS

Total number of units purchased

- 340B
- Non-340B

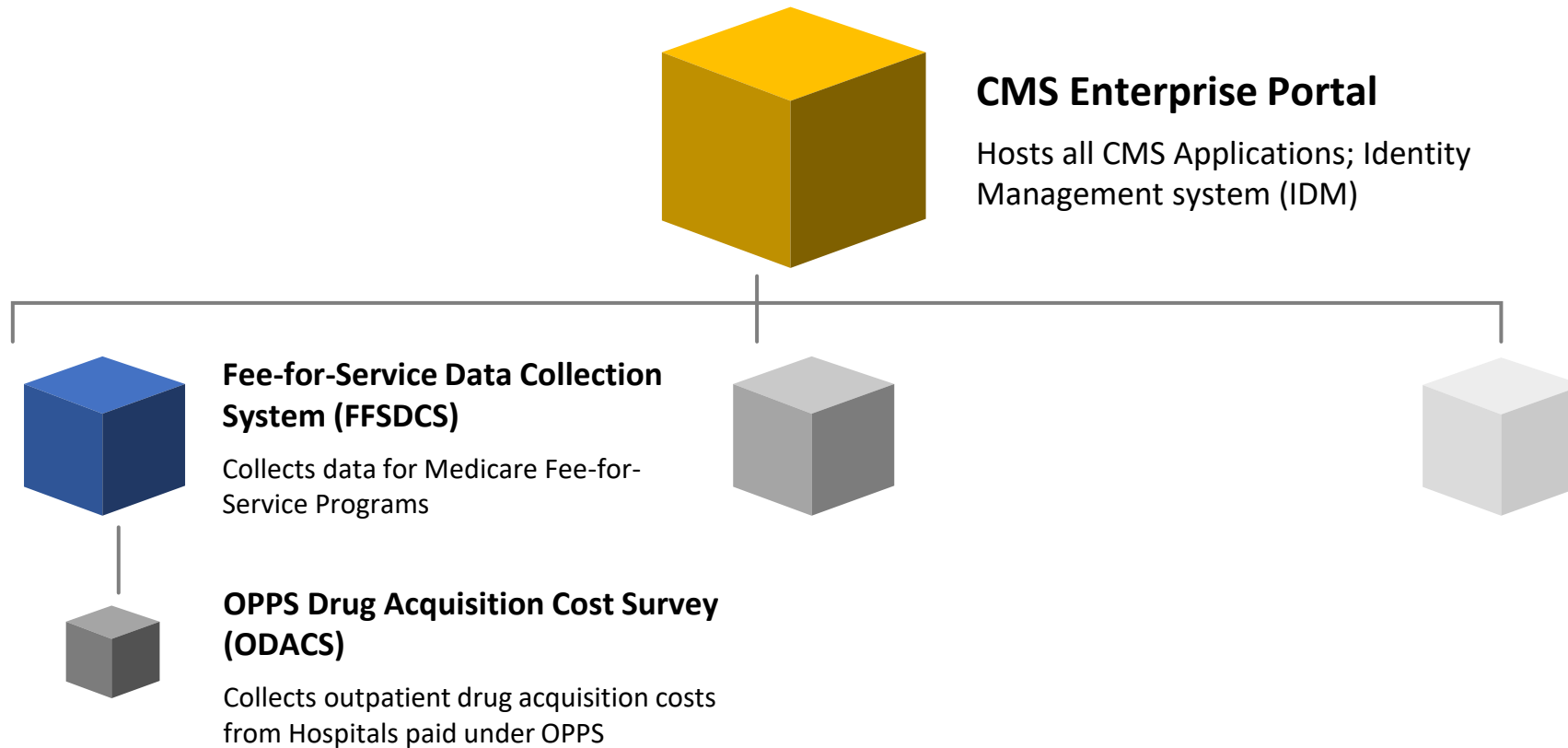


COST

Total NET costs (inclusive of all discounts, rebates, and other price concessions)

- 340B
- Non-340B

Data Collection System



Getting Started

1



Select Submitter

Identify the most appropriate person to submit on behalf of your CCN.

2



Create Portal Account

Create an account in the CMS Enterprise Portal and verify your identity.

3



Gather Data

Work with your suppliers, wholesalers, and internal teams to gather the data.

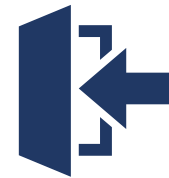
4



Register

Enter the registration code when the system is live.

5



Submit Data

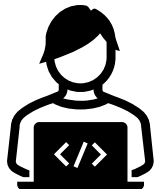
Submit your OPPS drug acquisition cost data in the ODACS Data Collection System.

ODACS Roles

CMS has identified two main roles for this survey initiative.



The **Hospital Point of Contact (POC)** is the official representative for the Hospital/CCN who has access to the data needed to complete the outpatient drug acquisition cost survey - OR - has the authority to delegate the data submission to another responsible individual. CMS will send all official notifications to the POC.



The **Submitter** is either the POC or an individual selected by the POC who will create an account in the CMS Enterprise Portal, register with the ODACS survey module, submit data on behalf of their CCN, and attest to data accuracy. There may only be one Submitter per CCN. A Submitter may submit on behalf of multiple CCNs.

CMS Enterprise Portal Account

ODACS Registration Guide

The Submitter for each CCN will follow the steps as outlined in the Registration Guide to create a CMS Enterprise Portal Account and request access to the ODACS Survey Module.

Create Username and Password



Set up Multifactor Authentication



Request Access to FFSDCS as an ODACS Submitter



Verify Identity using Personal Information



Gather Data

STEP 01



Establish your team.
Collaborate with your wholesalers and other vendors.

STEP 02



Run all purchase reports and gather invoices.

STEP 03



Gather any additional discounts and rebates.

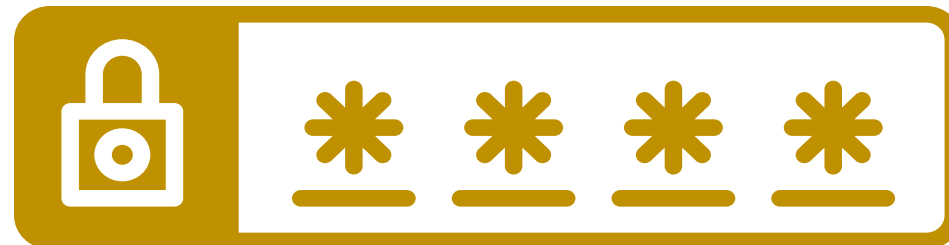
STEP 04



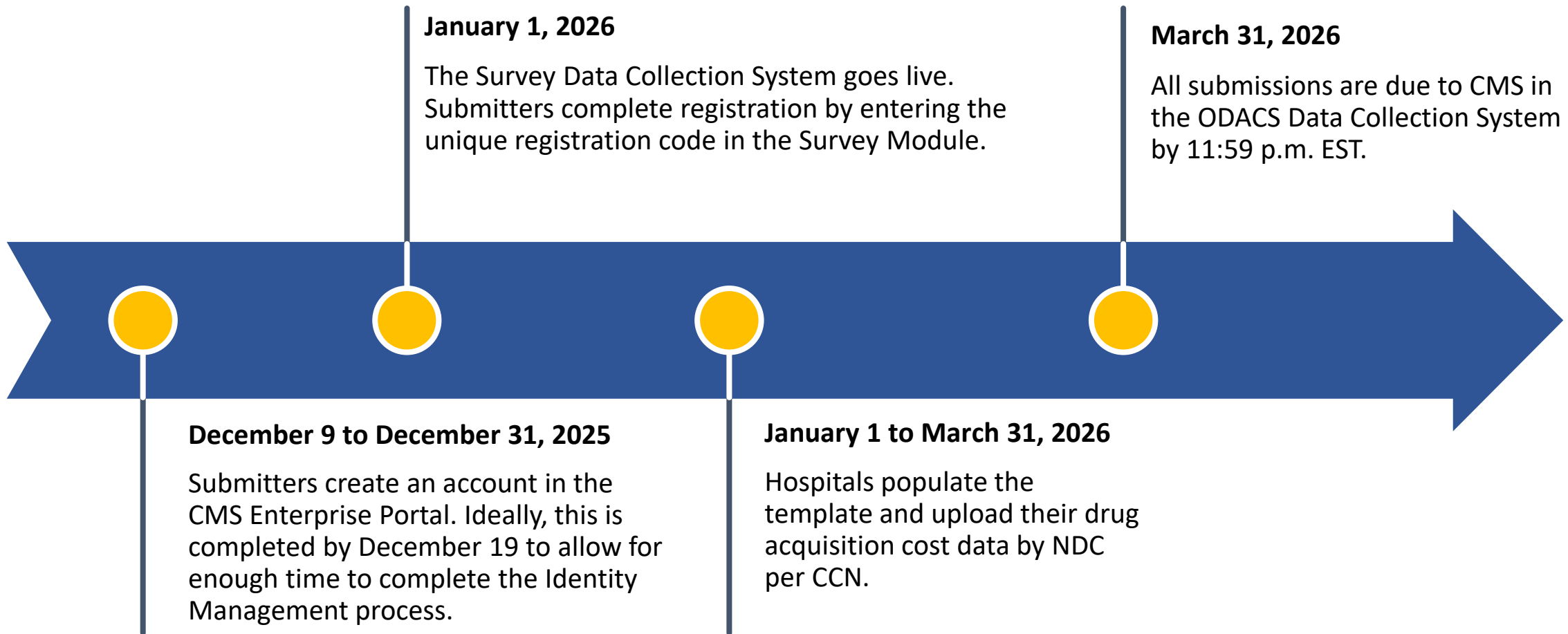
Use the template provided to organize your data.

Registration

- CMS will send unique Registration Codes to the POC for each CCN on or around **December 19, 2025**.
- When the system is live on **January 1, 2026**, the POC can share the Registration Code with the submitter to complete registration in the Survey Module.



Timeline



What's Next?

- ✓ Select the Submitter for each CCN.
- ✓ Begin creating an account in the CMS Enterprise Portal.
- ✓ Gather your data.
- ✓ Visit the [OPPS Drug Acquisition Cost Survey Website](#)
 - Registration Guide
 - FAQs
 - How to Prepare Fact Sheet
 - ODACS Data Template
 - Webinar Recording

Support

- **Technical Support (DCCA)**
 - odacshelpdesk@dcca.com
 - 1-844-876-0765
- **Feedback and Other Questions**
 - OPPSDrugSurvey@cms.hhs.gov



Q&A

