

Centers for Medicare & Medicaid Services

CY 2026 Part C Baseline Out-of-Pocket Cost Model FAQs

1. **Question:** Does the Centers for Medicare & Medicaid Services (CMS) offer any alternative methods for calculating Out-of-Pocket Cost (OOPC) amounts for plan sponsors that do not have access to PC SAS?

Answer: CMS does not offer alternative tools for calculating OOPC values for plans that do not have access to SAS. We recommend that you continue to use the tools/methodology that you employed for calculating OOPC values for calendar year (CY) 2026.

2. **Question:** What is the Plan Benefit Package (PBP) database management system to store the data and run the CY 2026 Part C Baseline Model?

Answer: The web-based PBP module enables direct data entry on the Health Plan Management System (HPMS), which generates a text-based data format JavaScript Object Notation (JSON) file to download. No specific data management software is required. The JSON file is ready to be downloaded and stored in your specified directory for running the OOPC model.

3. **Question:** What are the changes in the CY 2026 Part C Baseline Model compared with CY 2026 Bid Review Model?

Answer: The CY 2026 Part C Baseline OOPC Model is an update of the CY 2026 Bid Review Model delivered in April 2025. For the CY 2026 Part C Baseline OOPC Model, the items listed below summarize the changes that have been made:

- Updated the SAS programs to map dental crown (DVCROWN) utilization and cost-sharing to Restorative Services (PBP category 16c1) from Prosthodontics, fixed Service (PBP category 16c7).
- Updated Medicare Current Beneficiary Survey (MCBS) data (replacing 2020 data with 2022 data) and inflation factors provided by the Office of the Actuary (OACT) to adjust 2021 and 2022 MCBS utilization cost data to CY 2026 levels.
- Updated Medicare Parts A and B deductibles and coinsurance amounts to 2026 values.

4. **Question:** Are Dual Eligible beneficiaries excluded from the OOPC Model estimates?

Answer: The OOPC tool will calculate the OOPC values for Dual Eligible SNPs. However, beneficiary data for dual eligible beneficiaries were excluded from the Medicare Current Beneficiary Survey (MCBS) data for the development of the OOPC model as it was deemed unrepresentative of the beneficiaries enrolling in these plans. Therefore, the resulting calculations may not be reliable for Dual Eligible SNPs. Please refer to the OOPC methodology document posted on the CMS website at:

<https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovGenIn/OOPCResources.html> for further technical details.

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5. **Question:** Will the CY 2026 Part C Baseline OOPC Model work with older versions of SAS or SAS versions other than PC SAS (e.g., SAS running on UNIX or Mainframe)?

Answer: The CY 2026 Part C Baseline OOPC Model has been tested on PC SAS Version SAS 9.4 TS Level 1M7 which includes the LIBNAME engine for JSON. CMS cannot guarantee a successful run on older version of SAS or SAS running in a different environment.

6. **Question:** Will the CY 2026 Part C Baseline OOPC Model run on a networked version of SAS?

Answer: The model code is platform independent and should be able to be run in a network environment.

7. **Question:** What is the approximate amount of free disk space necessary for the model to run?

Answer: It is recommended that the model requires at least 3GB of RAM and about 30GB of free disk space. However, the actual disk space requirements depend on the number of plans being run at one time and the particular hardware/software configuration of a user. In some cases, additional free disk space may be needed.

8. **Question:** Does the CY 2026 Part C Baseline OOPC Model require administrative rights on the computer to run?

Answer: Administrative privileges are not required to run this model on a PC.

9. **Question:** Does the CY 2026 Part C Baseline OOPC Model require any SAS add-ins to run? Is base SAS 9.4 sufficient?

Answer: Base SAS 9.4 TS 1M7 with a built-in LIBNAME engine for JSON is needed to run the model.

10. **Question:** How can organizations obtain information about policy related questions regarding standards for MA Total Beneficiary Cost (TBC)?

Answer: Organizations are encouraged to review the information provided annually by CMS and, if necessary, submit questions to the following mailboxes:

- For Part C policy related questions about TBC, please contact <https://mabenefitsmailbox.lmi.org/>
- For technical questions about the Bid Pricing Tool, please submit an email to actuarial-bids@cms.hhs.gov
- For technical questions about the OOPC model, please submit an email to OOPC@cms.hhs.gov