

Centers for Medicare & Medicaid Services

CY 2026 Part D 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 sponsors that do not have access to SAS. We recommend that you continue to use the tools/methodology that you previously employed for calculating OOPC values.

2. **Question:** What are the changes in the CY 2026 Part D Baseline Model compared with CY 2026 Bid Submission Model?

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

- Updated the Part D input data using the CY 2026 Formulary Reference File (FRF), released in September 2025.
- Updated maximum fair prices (MFPs) for CY 2026 selected drugs using the [Selected Drug and Negotiated Prices file](#) released 11/2025 for use in drug price calculation.
- Updated the SAS programs to include enhancements to incorporate benefit structure parameters for extended day supply cost-sharing amounts, providing increased accuracy of cost-sharing calculations for plan sponsors offering extended-day prescription fills.

3. **Question:** Will the CY 2026 Part D 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 D Baseline OOPC Model has been tested on PC SAS Version SAS 9.4 TS Level 1M7 which includes the LIBNAME engine for JSON (the model also can be run using SAS Enterprise Guide). CMS cannot guarantee a successful run on older versions of SAS or SAS running on a different environment.

4. **Question:** Will the CY 2026 Part D 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.

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

Answer: It has been 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.

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

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

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

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

8. **Question:** How can organizations obtain information about policy related questions regarding standards for PDP meaningful difference and 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, such as Total Beneficiary Cost (TBC), please submit inquiries to the [MA Benefits Mailbox at: mabenefitsmailbox.lmi.org](mailto:mabenefitsmailbox.lmi.org)
- For Part D policy-related questions about meaningful difference, please submit an email to PartDBenefits@cms.hhs.gov
- For technical questions about the Bid Pricing Tool, please submit an email to Actuarial-Bids@cms.hhs.gov
- For technical questions about the OOPC models, please submit an email to OOPC@cms.hhs.gov