



**CENTERS FOR MEDICARE & MEDICAID SERVICES**

---

**DATE:** July 27, 2023

**TO:** All Current and Prospective Medicare Advantage, Prescription Drug Plan, PACE, Section 1876 Cost, and Demonstration Organizations

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

**SUBJECT:** Technical Guidance for Bid Resubmissions for CY 2024 Rebate Reallocation

This memorandum applies to all plans subject to rebate reallocation and provides tips and suggestions for navigating bid resubmissions during the upcoming rebate reallocation process. This guidance applies to CY 2024, as CMS intends to simplify the process for CY 2025.

When resubmissions are requested for plans eligible for this year's rebate reallocation process, CMS will open two resubmission gates in HPMS that will remain open during the rebate reallocation period:

- Medicare Advantage (MA) benefits
- Pricing

Currently, HPMS requires a new Plan Benefit Package (PBP)/Bid Pricing Tool (BPT) final submission when a resubmission is requested for any given plan. For these plans, action must be taken in the PBP to return the overall status to "ready for submission," even if changes are not needed in the PBP.

## **MA Benefits**

When the MA benefit gate is opened, HPMS will reset the overall PBP status and the visitor travel section status to "in progress." The "in-progress" status allows changes to be made to any MA section of the PBP, not just the visitor travel section. *Note: CMS is resetting the visitor travel section as it would require the least number of clicks to return the section to a "complete" status.*

## **Part D (PD) Benefits**

The PD benefit gate will **not** be opened by default as part of the rebate reallocation process. If Part D benefit changes are needed, please contact the Part D benefits team at [PartDBenefits@cms.hhs.gov](mailto:PartDBenefits@cms.hhs.gov).

In cases where the PD benefit gate is opened, HPMS will reset the overall PBP status and the Rx section status to “in progress.”

## Pricing

When the pricing gate is opened, HPMS will allow a new BPT upload.

**If your plan is eligible for rebate reallocation, you must perform a PBP/BPT final submission before the deadline, even if you are not making changes to your bid submission.**

In the case of a segmented plan, all segments of the plan must have a new PBP/BPT final submission.

Please use the following guidelines to ensure that a successful PBP/BPT final submission is performed for all plans before the close of the rebate reallocation window.

	Changes Needed	No Changes
<b>PBP</b>	<ul style="list-style-type: none"><li>• Access the PBP.</li><li>• Select save/next in the “in progress” visitor travel section to mark the section as “complete.”</li><li>• Make changes, as needed, to other sections of the PBP, marking those sections as “complete.”</li><li>• Once all sections are marked as “complete,” the overall PBP will return to the “ready for submission” status.</li></ul>	<ul style="list-style-type: none"><li>• Access the PBP.</li><li>• Select save/next in the “in progress” visitor travel section, which will mark the overall PBP as “ready for submission.”</li></ul>
<b>BPT</b>	<ul style="list-style-type: none"><li>• Upload the new BPT(s).</li></ul>	<ul style="list-style-type: none"><li>• No action required.</li></ul>
<b>PBP/BPT Final Submission</b>	<ul style="list-style-type: none"><li>• Perform a new PBP/BPT final submission once the PBP is marked as “ready for submission” and the appropriate BPT(s) are uploaded successfully.</li></ul>	<ul style="list-style-type: none"><li>• Perform a new PBP/BPT final submission once the PBP is marked as “ready for submission.”</li></ul>

CMS **strongly recommends** that all plans subject to CY 2024 rebate reallocation perform their PBP/BPT final submissions as early as possible during the resubmission window.

For questions regarding this memo, please contact the HPMS Help Desk at either [hpms@cms.hhs.gov](mailto:hpms@cms.hhs.gov) or 1-800-220-2028.