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**DATE:** November 1, 2016  
**TO:** All Part D Sponsors  
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**SUBJECT:** Phased Implementation of the Medicare Part D Prescriber Enrollment Requirement  
by January 1, 2019

### **Phased Implementation of the Medicare Part D Prescriber Enrollment Requirement**

The Centers for Medicare & Medicaid Services (CMS) finalized CMS-4159-F *Medicare Program; Contract Year 2015 Policy and Technical Changes to the Medicare Advantage and the Medicare Prescription Drug Benefit Programs* (“Final Rule”) on May 23, 2014. On May 6, 2015 CMS published CMS-6107-IFC *Medicare Program; Changes to the Requirements for Part D Prescribers*, an interim final rule with comment (“IFC”) that made changes to the Final Rule. These regulations are codified at 42 CFR § 423.120(c)(6). We refer to these rules in this memo as the “Part D Prescriber Enrollment Requirement.”

CMS is implementing a multifaceted phased approach to ensure enforcement of the Part D Prescriber Enrollment Requirement by January 1, 2019. While CMS is committed to the implementation of the Part D Prescriber Enrollment Requirement, CMS also recognizes the need to minimize the impact on the beneficiary population and ensure beneficiaries have access to the care they need. To strike this balance, CMS will implement a multifaceted phased approach which will align enforcement of the Part D Prescriber Enrollment Requirement with other CMS initiatives. Full enforcement of the Part D Enrollment Requirement will be January 1, 2019.

With the revised date, CMS will employ additional strategies in the interim to increase prescriber enrollment and identify and eliminate vulnerabilities to strengthen the Medicare Part D program. CMS will provide further guidance on the implementation of the above referenced additional strategies in future guidance. In addition, this delay will provide Part D sponsors and pharmacy benefit managers (PBMs) and Medicare Advantage Organizations (MAOs) offering MA-PDs sufficient time to finalize the system enhancements needed to comply with the Part D Prescriber Enrollment Requirement and various guidance documents released by CMS since publication of the IFC. These various guidance documents are available at: <https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovGenIn/Prescriber-Enrollment-Information.html>.

Questions concerning this memo may be addressed to [ProviderEnrollment@cms.hhs.gov](mailto:ProviderEnrollment@cms.hhs.gov).