

# Putting the Fun in MFP

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# DISCLOSURE STATEMENT

- Danielle Pierce has no relevant financial relationship(s) with ineligible companies to disclose.

*and*

- None of the planners for this activity have relevant financial relationships with ineligible companies to disclose.





## LEARNING OBJECTIVES

At the completion of this activity, the participant will be able to:

- Describe the MFP process fully
- Create an executable plan for your pharmacy to audit claims without the use of third-party entities
- Discuss the intersection of MFP and the 340B Rebate Model



## Definitions

**Maximum Fair Price (MFP)** is the maximum payment price negotiated by CMS and drug manufacturers.

**The Medicare Transaction Facilitator (MTF)** is the CMS platform that handles the data between manufacturers, PBMs, and pharmacies. This platform screens for only claims eligible for MFP refunds and facilitates payment back to the pharmacy.

**Beacon MFP** is a website that provides additional insight into claim information, more detailed responses from manufacturers, and where Good Faith Inquiries (GFIs) are conducted.

The **Standard Default Refund Amount (SDRA)** is the estimated refund to be provided by the manufacturer. Calculated currently as WAC minus MFP price for most drugs.

**Beacon 340B** is a website used to upload claims for the 340B Rebate, effective January 1, 2027.





# STARRING NOW

NOW NEGOTIATED • MEDICARE DRUG PRICE PROGRAM



**JANUVIA**

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**FIASP/NOVOLOG\***

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**FARXIGA**

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**ENBREL**

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**JARDIANCE**

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**STELARA\***

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**XARELTO\***

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**ELIQUIS**

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**ENTRESTO\***

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**IMBRUVICA**

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★ H A L L O F F A M E ★

# The Class of 2027

*Fifteen inductees take their place on the wall*

★ Ozempic; Rybelsus; Wegovy

★ Trelegy Ellipta

★ Xtandi

★ Pomalyst

★ Ofev

★ Ibrance

★ Linzess

★ Calquence

★ Austedo; Austedo XR

★ Breo Ellipta

★ Xifaxan

★ Vraylar

★ Tradjenta

★ Janumet; Janumet XR

★ Otezla; Otezla XR

★ S T A R T I N G L I N E U P ★

# The 2028 Starting Lineup

*Fifteen selected drugs taking the field — prices effective January 1, 2028*

01 Trulicity

02 Biktarvy

03 Orencia

04 Cosentyx

05 Erleada

06 Kisqali

07 Entyvio

08 Verzenio

09 Botox

10 Lenvima

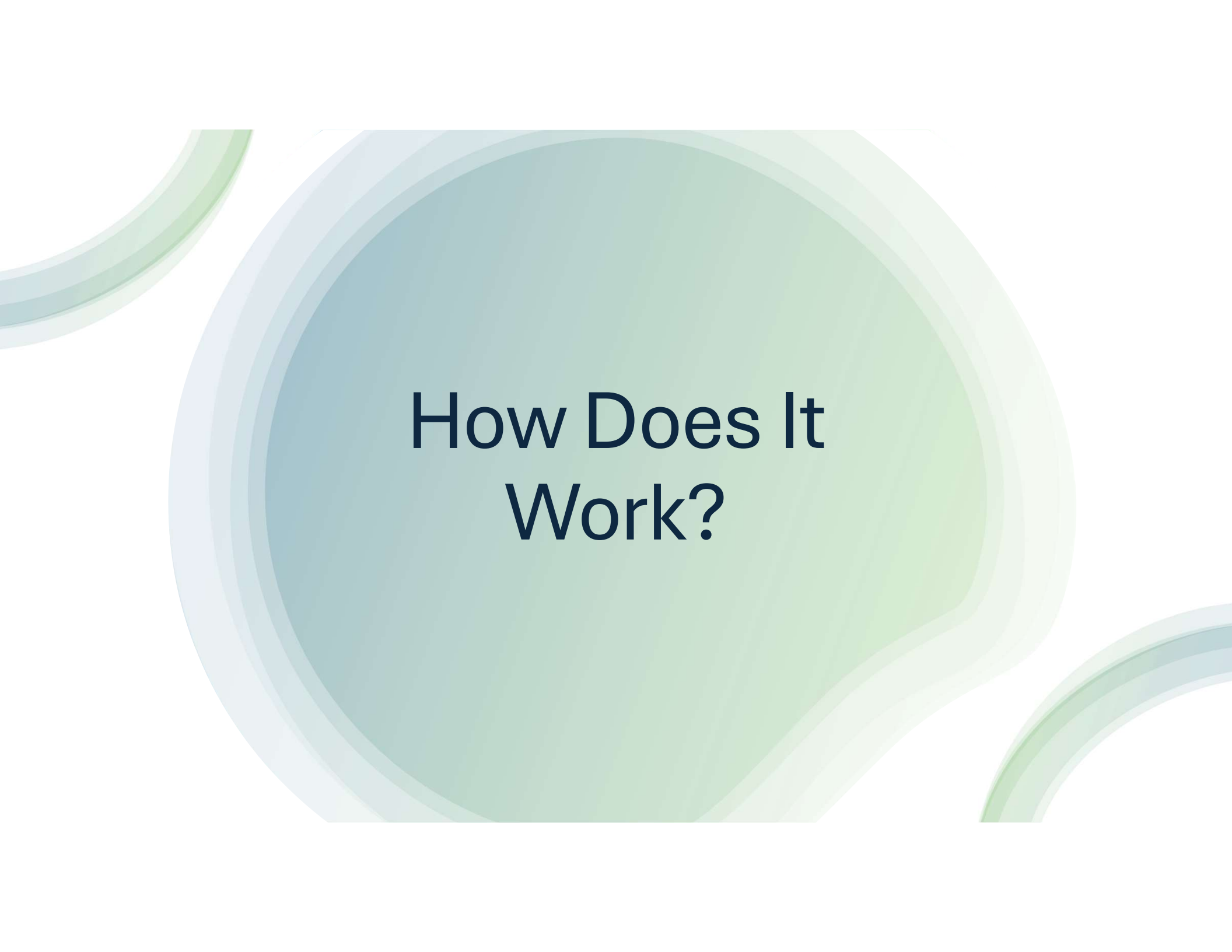
11 Xolair

12 Rexulti

13 Xeljanz; Xeljanz XR

14 Anoro Ellipta

15 Cimzia



How Does It  
Work?

## STEP 01

### CLAIM SUBMISSION BY PHARMACY

The pharmacy processes a claim like normal to the PBM. If an IPAY Medication and Medicare D claim, pharmacy will receive remit of MFP with an SDRA listed.

## STEP 03

### MTF SUBMITS CLAIM TO BEACON

MTF will process the data and ensure this is for a proper NDC and Medicare plan, then send to Beacon/MFG

## STEP 05

### PHARMACY GETS A RESPONSE OR PAYMENT

The pharmacy will see a response in the MTF portal and receive an 835 with remittance information for the refund, if due.

## ROAD TO AN MFP REFUND

## STEP 02

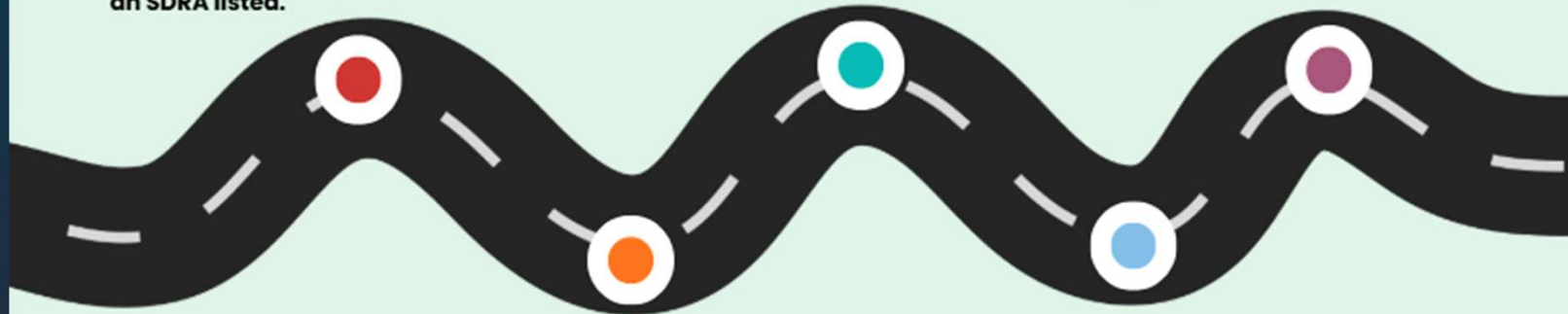
### PBM SUBMITS CLAIM TO MTF

The PBM will send claim information over to the MTF. This information will include the NDC, BIN, PCN, and modifiers submitted.

## STEP 04

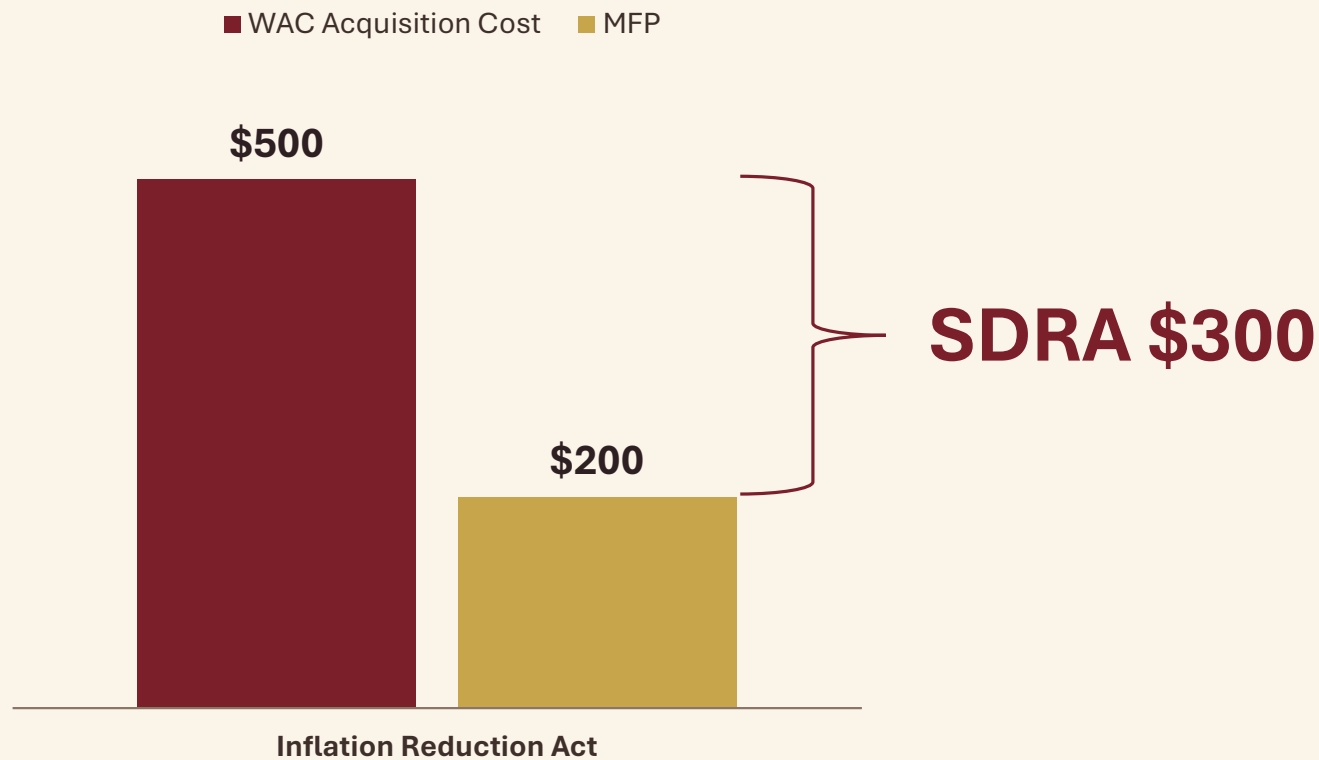
### BEACON/MFG SUBMITS CLAIM BACK TO MTF

The MFG will make a determination on if a MFP Refund is due. That information will be loaded in Beacon, and sent to the MTF for processing.



# WAC Acquisition Cost vs. Maximum Fair Price

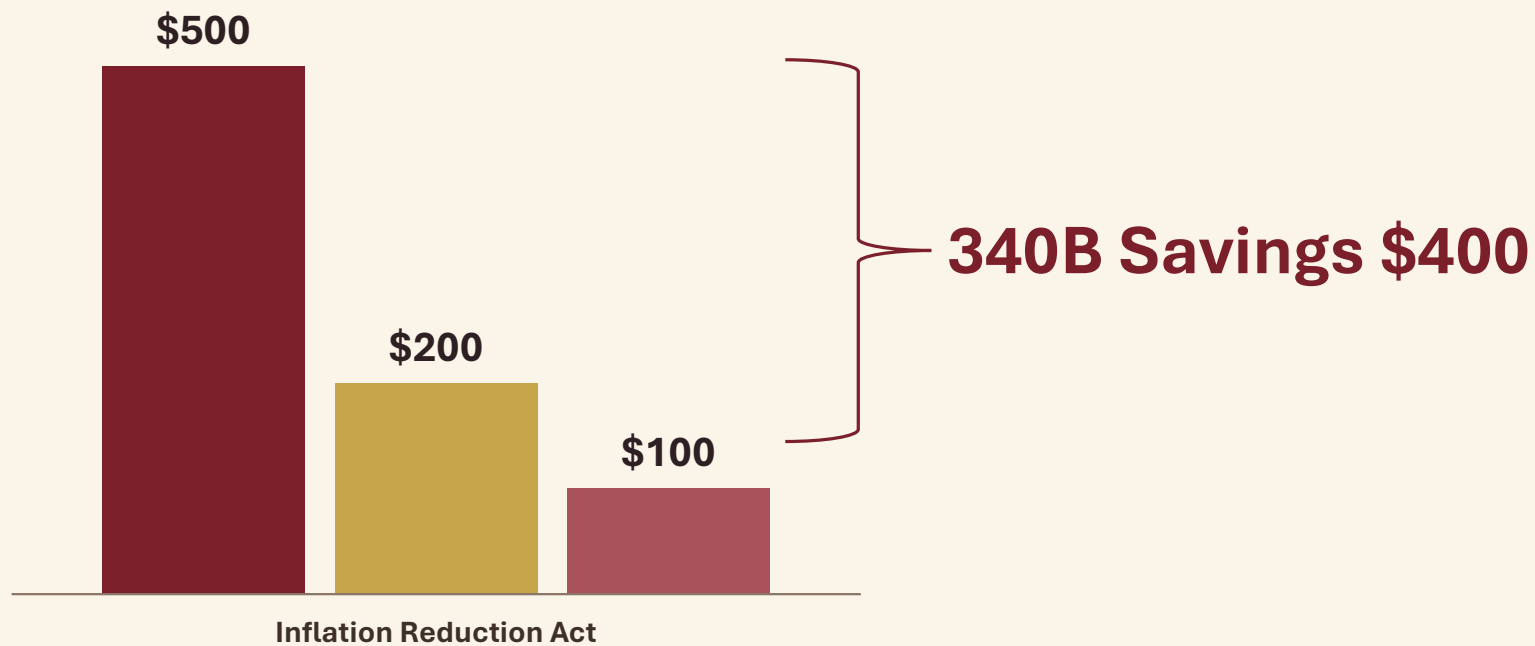
Under the Inflation Reduction Act



# Maximum Fair Price and 340 Savings

Under the Inflation Reduction Act

■ WAC Acquisition Cost ■ MFP ■ 340B Price



# To Be Clear...

- The MFP refund is not:
  - A dispensing fee paid to the pharmacy
  - A massive Gross Profit that rivals 340B savings
- The MFP is:
  - The amount paid back to the pharmacy based on the WAC minus MFP calculation (or contract price calculation)
  - Intended to simply make the pharmacy “whole” for the acquisition of the product.

# When To Expect Payment

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- Timeline:
  - Max of 7 days for PBM to send data to MTF
  - Manufacturer has 14 days to process request (approve or deny refund)
  - MTF issuing refunds with the banks can take several days
- Most places are seeing payment in ~21 days



# Deduplication – Can't Stack Coupons

- Only one “benefit” can be used
- 340B Pricing or MFP Refund
- Ways to prevent getting 2 “benefits”:
  - Submitting modifiers (SCC 20)
  - Manually identifying claims as 340B in Beacon MFP

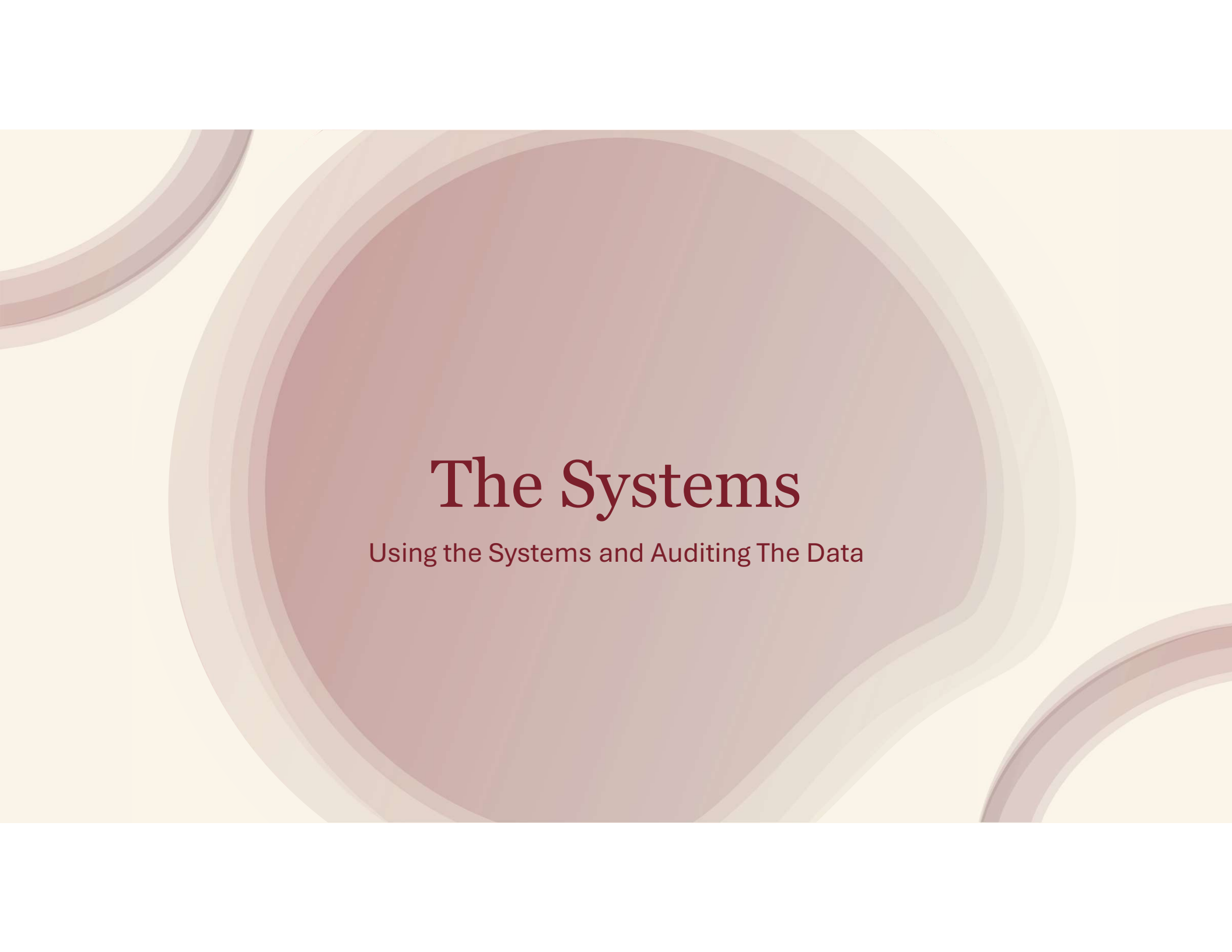


# Why Does It Matter?

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- For pharmacies with WAC and 340B prescriptions
  - MFP Refund may be paid despite getting the drug at 340B price
    - Submitting modifiers up front or quickly identifying claims as 340B eligible in Beacon MFP can help prevent this
  - Would “IOU” a Manufacturer in MTF





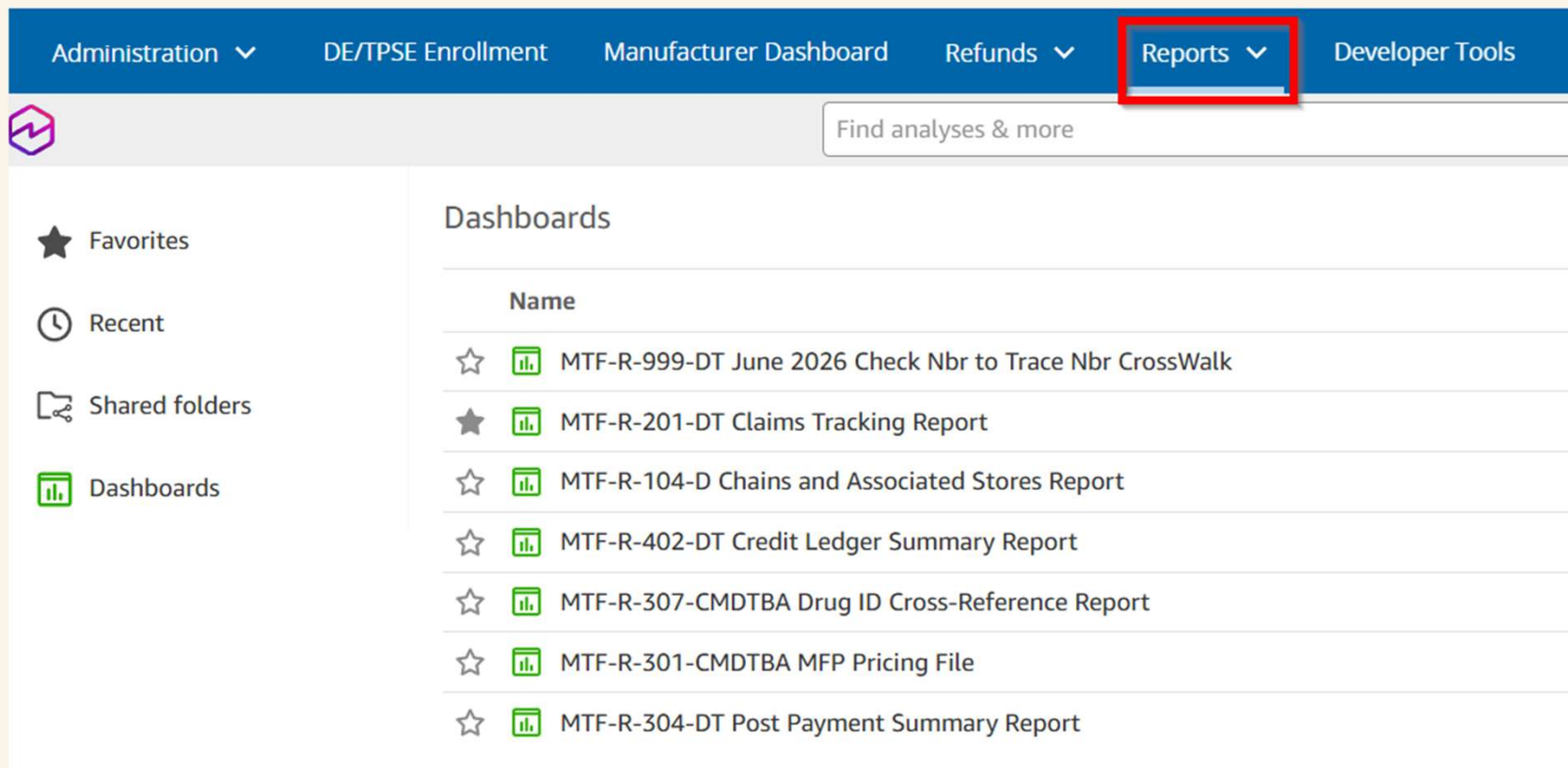
# The Systems

Using the Systems and Auditing The Data

# Medicare Transaction Facilitator

- CMS's platform for the MFP process.
  - Pharmacies should access the Data Module (MTF-DM)
- Reports are very helpful to connect dispensing data and payments
- Reports will show credits outstanding to manufacturers
- Can access MFP Price File for drugs

# Reporting in the MTF



The screenshot shows the MTF Reports page. The top navigation bar is blue and contains the following items: Administration, DE/TPSE Enrollment, Manufacturer Dashboard, Refunds, Reports (highlighted with a red box), and Developer Tools. Below the navigation bar is a search bar with the placeholder text "Find analyses & more". On the left side, there is a sidebar with the following items: Favorites, Recent, Shared folders, and Dashboards. The main content area is titled "Dashboards" and contains a table of reports.

|                                                                                       | Name                                                    |
|---------------------------------------------------------------------------------------|---------------------------------------------------------|
| ☆    | MTF-R-999-DT June 2026 Check Nbr to Trace Nbr CrossWalk |
| ★    | MTF-R-201-DT Claims Tracking Report                     |
| ☆  | MTF-R-104-D Chains and Associated Stores Report         |
| ☆  | MTF-R-402-DT Credit Ledger Summary Report               |
| ☆  | MTF-R-307-CMDTBA Drug ID Cross-Reference Report         |
| ☆  | MTF-R-301-CMDTBA MFP Pricing File                       |
| ☆  | MTF-R-304-DT Post Payment Summary Report                |

# Claims Tracking Report

## Description:

- Report that shows claim-specific information regarding payment and the claim status (Current Location). This report will show both the original Rx number and the ICN number in the same place.

## Use:

- Can be used to track claims submitted and refund due. Will provide you a reason for the payment amount from the manufacturer.
- Exportable!
- Able to be filtered live in the portal!

## Challenges:

- Claims that have been reversed/rebilled or reprocessed in some way are given a cross reference ICN (XREF ICN).
- If trying to match to your pharmacy dispensing data, may pose a challenge

# Cracking The Codes

- MTF Method for Determining MFP Refund Amount Code (Pricing Method Code)
- 1 – SDRA
- 2 – Paid Other Amount than SDRA
- 3 – No Refund – Prospective MFP Access
- 4 – No Refund Paid – Section 1193(d)(1) Exception → \*340B Claim\*
- 5 – No Refund – Payment Unsuccessful
- 6 – No Refund - Other
- 7 – Refund Consistent with Alternative Reconciliation



# Credit Ledger Summary Report

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## Description:

- Can provide credit information by Drug, MFG, and ICN over a date range. Can provide a summary or details.

## Use:

- Can help sift through the “noise” of the claims report to get to what credits are on the account

## Challenges:

- If trying to match back to Claims Tracking Report, will likely need to use XREFs and/or pharmacy dispensing data



# Beacon MFP

- Shows claim-level detail, but de-identified using an ICN number instead of an RX number
- Allows you to identify a claim as 340B eligible in the portal, if not done with modifiers
- Provides more information on why a manufacturer may or may not have paid an MFP Refund
- Helps dispute MFP Refunds that may have been paid when not due, or not paid when due



# Non-Payment Decisions

Manufacturers may be making decisions on claim 340B eligibility, even if the claim is not eligible



Auditing claims may be necessary for pharmacies to balance out refunds

Considerations for mixed-use in-house pharmacies

Considerations for 340B-only pharmacies

Considerations for contract pharmacies

# **Beacon MFP Validation Codes Related to 340B**

- P1 – Claim had 340B modifier
- P2 – Claim submitted on ESP
- P3 – Evidence of a recent 340B purchase
- P4 – Prescription written by 340B provider & dispensed at pharmacy with recent 340B purchase
- P5 – Basis price is a Contract Price
- P7 – Value other than WAC used for MFP rebate amount
- P8 – Claim manually identified by CE as 340B
- P9 – Claim identified as 340B according to aggregate 340B purchase history of the dispensing entity

# But Wait... Those Codes Aren't The Same!

- Beacon MFP Codes

- P1 – Claim had 340B modifier
- P2 – Claim submitted on ESP
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## MTF Code

- No Refund Paid – Section 1193(d)(1) Exception



# Beacon's MRN, MRA, & MRR

## Manufacturer Refund Notice (MRN)

- Refund information sent from MTF to Beacon/manufacturers that includes the calculated SDRA.

## Manufacturer Refund Advice (MRA)

- Provides remittance information from the manufacturer back to the MTF with the amount the manufacturer is to pay out as a refund.
- Must be sent within 14 days of the MRN being sent.

## Manufacturer Refund Receipt (MRR)

- Notice back to the manufacturer by MTF acknowledging their receipt of the MRA.

# In Other Words....

## MRN



## MRA



## MRR



# Rebate Details

All historical and associated rebate details



|            |          |                 |
|------------|----------|-----------------|
| Pharmacy   | Status   | Approved Amount |
| [Redacted] | Approved | \$163.41        |

## MRN

|                 |                  |               |             |               |            |
|-----------------|------------------|---------------|-------------|---------------|------------|
| Processed Date  | Manufacturer     | Product Name  | Days Supply | Qty Dispensed | SDRA       |
| 01/16/2026      | AstraZeneca      | DAPAGLIFLOZIN | 30          | 30.0          | \$196.87   |
| Date of Service | Service Provider | NDC           | Fill Number | WAC           | MFP        |
| 01/14/2026      | [Redacted]       | 66993045730   | 4           | \$12.61533    | \$6.052894 |

## MRA

Method for Determining MFP Refund Amount  
02 - Amount Other Than SDRA

## MRR

|                           |                        |                          |                                      |
|---------------------------|------------------------|--------------------------|--------------------------------------|
| MRA Receipt Date          | Net Outstanding Amount | Actual Withdrawal Amount | Date of Payment to Dispensing Entity |
| 2026-01-28                | \$163.41               | \$163.41                 | 02/04/2026                           |
| Payment Finalization Date | Credit Applied Amount  |                          |                                      |
| 2026-02-04                | \$0                    |                          |                                      |

# Reversals

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- Reversed claims will process through the same flow as a submitted claim for payment.
- If an MFP Refund was paid, a credit will be placed on the account for the manufacturer
- An XREF ICN will be present on both Beacon MFP and the MTF portals linking the original claim with the reversed claim
- Remember: outstanding credits to manufacturers can be seen in the MTF under Credit Ledger Summary Report



# Good Faith Inquiry

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- Conducted on the claim
  - “Submit New Inquiry” button in claim in Beacon
- Beacon has developed a GFI Wizard that helps guide through the submission process
- If the GFI tool isn’t available, the claim may not be in a status that permits the GFI just yet
- If the GFI yields an outcome that is not correct, the CE can approach CMS for a dispute with the GFI response



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# Auditing



Work with PMS to retrieve details on submitted claims

SCC codes submitted  
Third Party Information  
NDC  
Rx Number



Using data from MTF reporting, compare PMS data to MTF data to retrieve ICN number or XREF



Beacon has ICN numbers and P codes in exports



MTF should show “Method For Determining MFP Refund Amount” code/verbiage



Will need to go claim-by-claim to see P-codes used in Beacon

# Who Uses What?



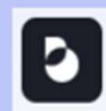
Pharmacy

RX Number

**MEDICARE**  
TRANSACTION  
FACILITATOR

Medicare  
Transaction  
Facilitator

ICN



Beacon MFP

# 340B Rebate Model

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Has Entered The Chat



# Beacon MFP Has A Twin



**Purple site is MFP**



**Blue site is 340B**

# General Flow of MFP Rebate vs 340B Rebate

Claim Submission to  
PBM at Pharmacy and  
Pharmacy Paid MFP  
with an SDRA listed

MTF Submits Claim to  
MFG via Beacon MFP

Pharmacy is Paid MFP  
Rebate and an 835 is  
sent for reconciliation

PBM Submits Claim to  
MTF

Beacon/MFG Submits  
Claim back to MTF

Claim Submission to  
Beacon 340B for 340B  
Rebate

Beacon 340B Submits  
Claim to MFG

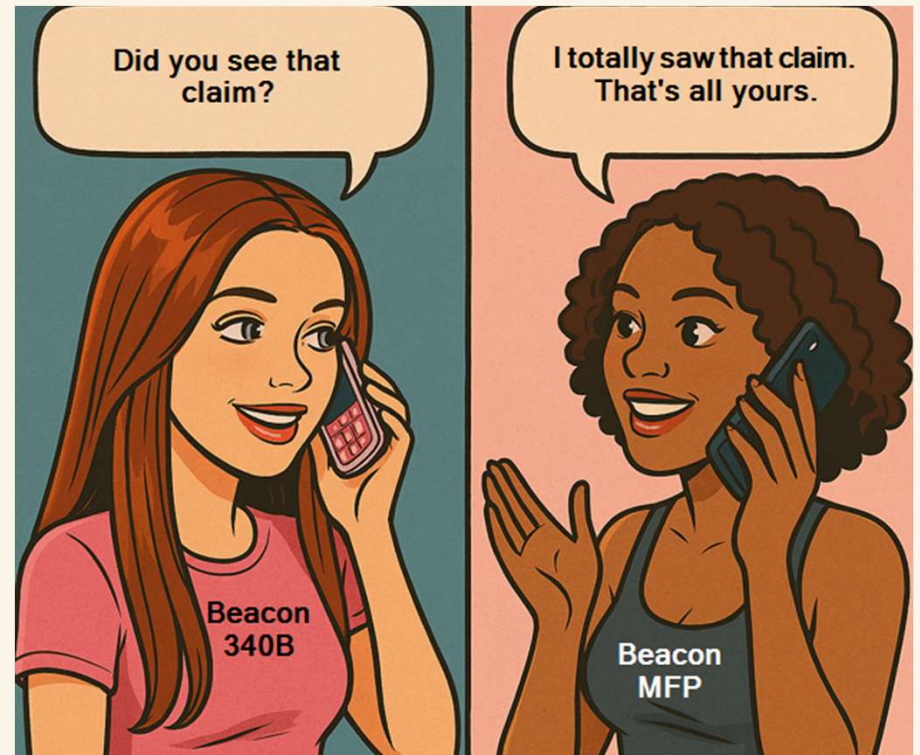
340B Rebate issued by  
Beacon 340B  
platform\*

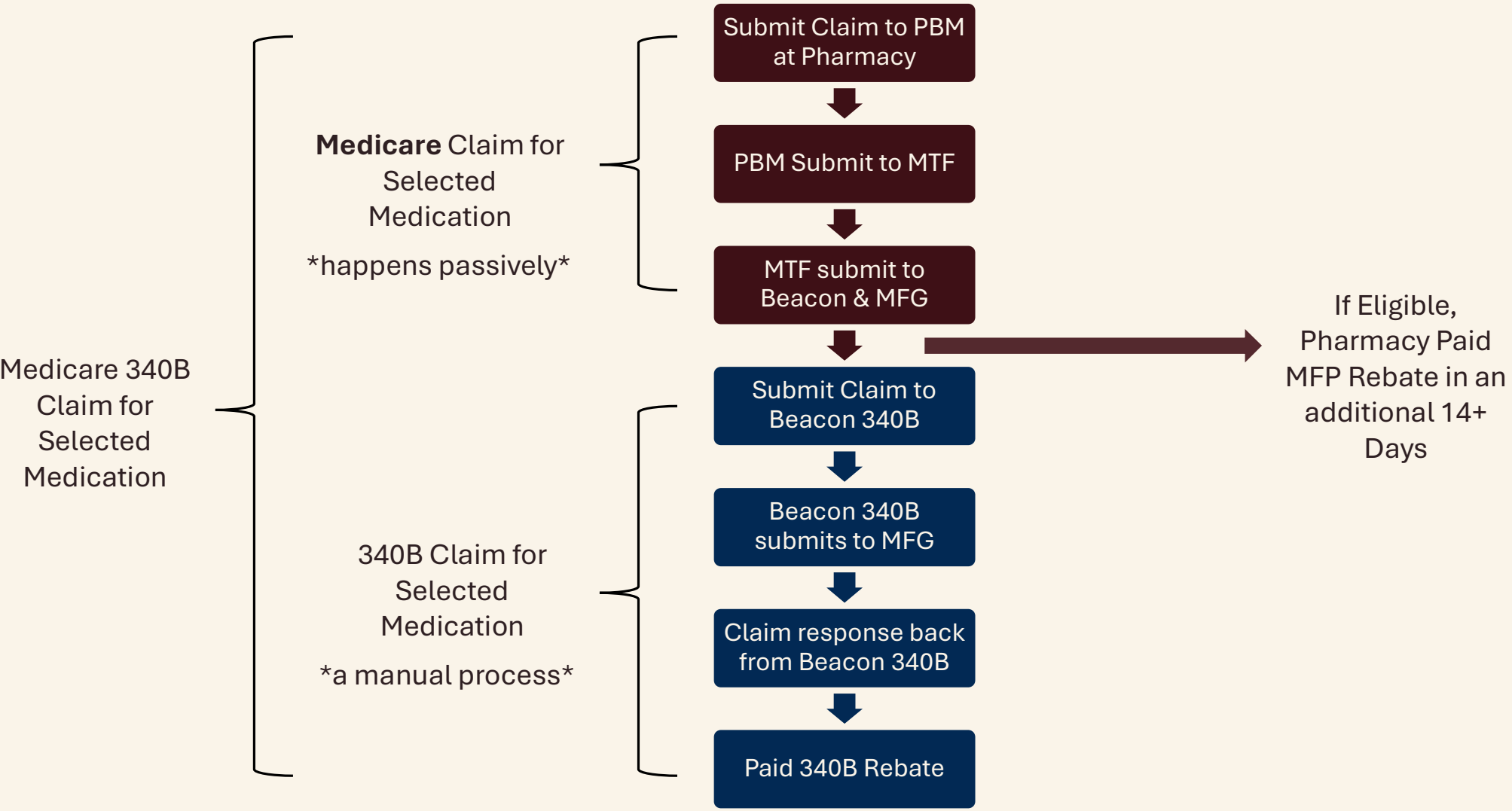
Beacon 340B Talks to  
Beacon MFP to say a  
340B rebate is being  
sought

MFG Submits Claim  
Response Back to  
Beacon 340B for 340B  
Rebate Payment

# The Overlap

- While the two processes are different, these two rebate systems will overlap for your pharmacy
- Remember, Beacon 340B will talk to Beacon MFP





# Timing

- Operationally, timing matters when considering rebates
  - It is important everyone understands your pharmacy workflow
- MFP Rebate may happen in as little as 21 days
- 45 Days to Submit to Beacon 340B after adjudication date
  - Recommended to submit earlier than 45 days



Medicare 340B Claim

Medicare Claim

340B Claim

Submit Claim to PBM at Pharmacy

PBM Submit to MTF

MTF submit to Beacon & MFG

Submit Claim to Beacon 340B

Beacon 340B submits to MFG

Claim response back from Beacon 340B

Paid 340B Rebate

**Claim #1 – Medicare 340B Rx**  
Took 35 days to submit for 340B rebate.  
No modifiers & Didn't mark in Beacon.

Paid MFP: \$50

Paid MFP Rebate: \$100



Beacon 340B will let Beacon MFP know this claim has been requested for 340B rebate.

A credit (to the MFG) will be placed on your MTF and will be utilized for the next MFP rebate.

Paid 340B Rebate: \$200

Total Rebates Paid: \$300

Total Price Paid: \$350

**Only 1 Rebate. Paid should be \$250**

**Claim #2 – Medicare Rx**  
No submission for 340B Rebate.

Paid MFP: \$50

No Rebate Issued

MTF utilized credit on the account from Claim #1 that was paid out when 340B Rebate was paid

Total Price Paid: \$50

# 340B Rebate Submission Tips

- Setting TPA as Partner in Beacon 340B to allow them to submit on your behalf
  - Ask about timing of claims in your portal for eligibility determination
    - Remember, only a 45-day window
- Only submitting in-house 340B claims to Beacon 340B when sold to patients
  - This will prevent having to do reversals in the Beacon 340B system
- Ensuring PMS or other vendor can generate reports to submit to Beacon 340B in correct format
  - Multiple grant numbers?



# Beacon 340B Portal Front End Validations

- The same feel as 340B ESP
- Monitoring submitted claims to see if any are invalid
- Assess claims, correct claims (if applicable), and resubmit claims (if applicable)

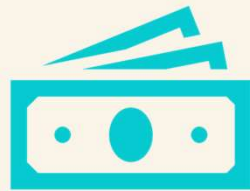


# Actual Acquisition Cost Submissions

- Ensuring claims can be submitted with the Net Acquisition Cost only when necessary
- Work with PMS Vendor
- Discuss with payer requiring AAC any safety net processes in place
  - Do they remit only at 340B ceiling?
  - If they have improper pricing loaded and you don't submit AAC, will there be a penalty or interest on resubmission or recoupment?



# Considerations



## Purchases at WAC

**Problem:** “Floating” money until rebates pay

- MFP Rebates – potentially 21+ days
- 340B Rebates – 10 days from whenever data is submitted

**Workaround:** Submit claims as soon as possible after sale date



## Inventory Holding Costs

**Problem:** Purchasing at higher cost

**Workaround:** Keep on-hand inventory lower to reduce frequency of purchasing at WAC until necessary



## Assessment Question 1

**Which best describes the Medicare Transaction Facilitator (MTF)?**

- A. A platform that facilitates the communication among pharmacies, PBMs, and manufacturers**
- B. A platform that assesses 340B eligibility for claims submitted to the portal**
- C. A platform that facilitates MFP refunds back to the pharmacy**
- D. A & B**
- E. A & C**



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## Assessment Question 2

**When evaluating the financial impact of the MFP refund process, which of the following is true?**

- A. Pharmacies do not experience any financial burden from this program because payment is handled at normal, contracted rates by the PBM**
- B. Pharmacies experience extreme financial burden because refunds require additional documentation, including dispensing data and chart notes**
- C. Pharmacies experience financial burden because the medication is purchased at WAC price, but reimbursement from the PBM is only at MFP. The refund comes later to make the pharmacy whole.**



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## Assessment Question 3

**How can your pharmacy audit MFP refunds in-house?**

- A. Use MTF alone, as all the data needed is in that website and GFIs can be conducted there if there is a dispute.**
- B. Use the MTF and Beacon MFP to extract data and map it together. This data can then be used with my pharmacy software information to assess what may need to be disputed or corrected.**
- C. Beacon MFP will be the only source that will be used, as all data fields, including Rx Number, PBM information, and pharmacy purchase history are in that site. No additional information should be needed.**



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## Assessment Question 4

**How will the rebate model intersect with the MFP workflow process?**

- A. Claims will have to be submitted to Beacon 340B to receive 340B rebates. The pharmacy will not be paid a 340B rebate and an MFP refund.**
- B. 340B claims do not need to be submitted to an additional portal. The process happens passively through the switch because pharmacies are mandated to submit modifiers. 340B refunds will automatically appear in 10 days after submitting to the PBM.**
- C. 340B claims have to be submitted to the Beacon 340B site manually, but there is no risk for receiving an MFP refund and a 340B rebate because manufacturers are waiting to process MFP refunds for 50+ days to see if pharmacies upload claims into Beacon 340B.**



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NEED MORE INFORMATION?

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