

April 9, 2025

Subject: Trump Administration Publishes the CY 2026 Medicare Advantage and Medicare Part D Final Rule

CPR Members:

On Friday, April 4th, the Centers for Medicare and Medicaid Services (“CMS”) published the **Contract Year (“CY”) 2026 Medicare Advantage and Medicare Part D Final Rule** to the Federal Register. CPR submitted comments (attached) in response to the proposed rule back in January, so we wanted to make sure you were aware of this development.

- Read the text of the final rule here:
<https://public-inspection.federalregister.gov/2025-06008.pdf>
- CMS’ fact sheet:
<https://www.cms.gov/newsroom/fact-sheets/2026-medicare-advantage-and-part-d-rate-announcement>
- CMS’ press release:
<https://www.cms.gov/newsroom/press-releases/cms-finalizes-2026-payment-policy-updates-medicare-advantage-and-part-d-programs>

Overall, the final rule is very lean as a majority of the proposals CPR weighed in on were not addressed and were either not finalized or deferred for subsequent rulemaking. Specifically, our comments focused on the sections of the proposed rule relating to requirements for plan use of internal coverage criteria, proposed revisions to the required metrics for the annual health equity analysis pertaining to the use of prior authorization, guardrails for the use of artificial intelligence (“AI”) to protect access to health services, network adequacy, and the proposed expansion in access to transformative anti-obesity medications under the Medicare Part D and Medicaid programs. Unfortunately, the Trump Administration did not move forward with finalizing any of these proposed policies, which were proposed in the waning days of the former Biden Administration.