

ADMINISTRATIVE BULLETIN 26-01

957 CMR 12.00: Pharmacy Benefit Manager Reporting

Effective May 29, 2026

The Center for Health Information and Analysis (CHIA) is issuing this Administrative Bulletin pursuant to 957 CMR 12.04(2) to notify Pharmacy Benefit Managers (PBMs) required to submit data and information to CHIA in accordance with 957 CMR 12.00 of clarifications to the scope of current reporting requirements and the scope of PBMs subject to those reporting requirements.

Pursuant to M.G.L. c. 12C, as amended by Chapter 342 of the Acts of 2024, CHIA promulgated 957 CMR 12.00: Pharmacy Benefit Manager Reporting as a new regulation to implement the new reporting requirement for PBMs. The FY26 PBM submissions, which are due on June 1, 2026, represent the first reporting cycle of PBM reporting of health care data and information to CHIA. As such, CHIA anticipates revisiting the scope of the current reporting requirements following this initial reporting cycle to explore opportunities to further refine and improve the PBM data collection process. The scope of the PBM reporting requirements for future reporting cycles may be revised on an as-needed basis in furtherance of the Commonwealth's legislative goals of increased pharmaceutical access, reduction in pharmaceutical costs, and increased pharmaceutical transparency.

Additionally, under the new PBM legislation, CHIA has broad authority to collect data and information from PBMs operating in Massachusetts. Unless and until CHIA issues further sub-regulatory guidance, CHIA is implementing 957 CMR 12.00 for the FY26 reporting cycle and subsequent reporting cycles by requiring submission from DOI-licensed PBMs operating in the Commonwealth.

This implementation approach should not be interpreted as a waiver or limitation of CHIA's authority to collect data and information from a broader group of PBMs. Further, CHIA reserves the right to expand the scope of PBMs subject to the reporting requirement to any PBM, whether licensed or unlicensed, that CHIA determines meets the statutory or regulatory criteria under M.G.L. c. 12C, § 10A or 957 CMR 12.00 for such data and information reporting.

For the avoidance of doubt, a PBM's obligation to submit data and information to CHIA under 957 CMR 12.00 is separate from any PBM assessment obligation under M.G.L. c. 12C, § 7 and 957 CMR 3.00. This Administrative Bulletin does not determine whether a PBM is subject to assessment, does not establish the amount of any assessment, and does not alter the methodology for calculating Claims Subject to Assessment under 957 CMR 3.00.