



Pharmacy Benefit Manager Market Check Summary Report Template

Effective: January 1, 2026

Background: If a Coordinated Care Organization (CCO) contracts with a Pharmacy Benefit Manager (PBM) other than the Oregon Prescription Drug Program (OPDP), then the CCO must require its PBM to fully cooperate with a CCO-directed annual third-party market check. The CCO must use a template provided by OHA to submit the findings of the third-party market check to OHA as specified in Exh. B, Pt. 2, Sec. 7, Para. e, Sub.Para. (2) (e) i. of the 2026 CCO contract and excerpted below:

"The market check must be performed annually by a neutral, unaffiliated third-party and be completed and delivered to Contractor by July 1 of each Contract Year. Contractor shall use the template provided by OHA on the CCO Contract Forms Website to submit the findings of the third-party market check. Contractor shall submit the findings to OHA, via Administrative Notice, within seven (7) Business Days of receipt of the third-party market check by Contractor."

If the third-party market check determines the PBM's actual performance is one percent (1%) or more behind the current market, the CCO must renegotiate and amend the subcontract as specified in Exh. B, Pt. 2, Sec. 7, Para. e, Sub.Para. (2)(f) of the 2026 CCO contract and excerpted below:

Renegotiate and amend the Subcontract with Contractor whenever a third-party market check determines the PBM's actual performance is one percent (1%) or more behind the current market in terms of aggregated gross plan pharmacy cost savings. Accordingly, the Subcontract with Contractor's PBM must include provisions that define the specific market check findings that trigger a review of pricing terms and when market check findings trigger a required renegotiation of terms with the Subcontractor. The Subcontract must explicitly require negotiation of improved terms that result from market check triggered amendments be made effective no later than October 1 of the evaluation year. For purposes of this requirement, "aggregated gross plan pharmacy cost savings" is defined as eligible charges plus all administrative fees paid to the PBM. The Subcontract may exclude claims from critical access pharmacies (as defined by Contractor) from the third-party market check.

Purpose: The purpose of the PBM market check is to validate the pricing that the CCO received from its subcontracted PBM by comparing it to what the CCO might have received from a competitor PBM. The PBM market check also allows the CCO to hold its PBM accountable to contractual terms and to monitor for possible improvements to its PBM programs, guarantees, and fees.

Instructions: The CCO shall use the information from the PBM market check to complete the Pharmacy Benefit Manager Market Check Summary Report Template. The Template contains the 2026 Pharmacy Benefit Manager Market Check Summary Report requirements described above. The Pharmacy Benefit Manager Market Check Summary Report template is located on the CCO Contract Forms webpage at: <https://www.oregon.gov/oha/HSD/OHP/Pages/CCO-Contract-Forms.aspx>.

NOTE: The PBM subcontract may exclude claims from critical access pharmacies (as defined by the CCO) from the third-party market check.

Due Date: A third-party market check must be completed and delivered to the CCO by July 1, 2026. The CCO must submit a completed Pharmacy Benefit Manager Market Check Summary Report to OHA within seven (7) days of receiving the market check from the third-party evaluator. The CCO must submit the completed form via the Contract Deliverables portal located at <https://oha-cco.powerappsportals.us/>. (The submitter must have an OHA account to access the portal.)

Technical Assistance: OHA is available for technical assistance prior to submission of the Attestation. The CCO should contact OHA for assistance as early as possible. The due date for the Attestation will not be extended because the CCO is awaiting assistance. Please email all technical assistance requests to CCO.MCOCDeliverableReports@odhsoha.oregon.gov .

1	Name of CCO: Click or tap here to enter text.
2	Date Submitted: Click or tap to enter a date.
3	Report submitter: Name: Click or tap here to enter text. Email: Click or tap here to enter text. Phone: Click or tap here to enter text.
4	Name of PBM: Click or tap here to enter text.
5	Name of entity performing market check: Click or tap here to enter text.
6	Market check entity contact: Name: Click or tap here to enter text. Email: Click or tap here to enter text. Phone: Click or tap here to enter text.
7	Claims used: <input type="checkbox"/> Whole year <input type="checkbox"/> Extrapolation
8	Date range of claims data used for market-check evaluation: Start date for range: Click or tap to enter a date. End date for range: Click or tap to enter a date.
9	How many comparators were used in the market check? Click or tap here to enter text.
10	What data points were evaluated? Mark all that apply. <input type="checkbox"/> Administrative fees <input type="checkbox"/> Dispensing fees <input type="checkbox"/> Guarantees <input type="checkbox"/> Rebates <input type="checkbox"/> Other – please specify: Click or tap here to enter text.
11	Were contractual triggers “tripped” as a result of the market check? <input type="checkbox"/> Yes <input type="checkbox"/> No
12	If a trigger(s) was tripped, did it result in improvements? Briefly describe. Click or tap here to enter text.
13	Provide a brief summary of the market check findings, specifically if the PBM terms were deemed competitive within the marketplace. Click or tap here to enter text.
14	Are there any specific elements that your CCO feels are important for OHA to add to evaluating PBM contracting to ensure taxpayers have assurances of OHA’s stewardship? Click or tap here to enter text.