Interpretation of the Announcement on the Public Disclosure of Pharmaceutical Products and Related Information That Have Passed the Preliminary Formal Review for the Adjustment of the National Basic Medical Insurance, Maternity Insurance, and Work-Related Injury Insurance Drug Catalog and the Commercial Health Insurance Innovative Drug Catalog for the Year 2026

China – NHSA National Healthcare Security Administration

Main information

Scope of Application:

Give clarifications on the procedures and eligibility criteria followed during the "Preliminary Formal Review" of the Y2026 Reimbursement List for BMI and other catalogs

Effective Date:

June 29th, 2026

Related Provisions:

- Social Insurance Law
- Interim Measures for the Administration of Basic Medical Insurance Drug Use
- Opinions of the State Council on Improving the Drug Price Formation Mechanism

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Key Topics

Framework

- **Definition and Role of Formal Review**: Formal review is the initial step in the catalog adjustment process, comprising four stages: preliminary review, publication of preliminary results, re-verification, and final announcement. Its purpose is to verify that declared drugs meet the applicable declaration conditions and that the submitted information is complete and standardized.
- The formal review follows a structured four-step workflow: (1) preliminary review, (2) publication of preliminary results for public comment, (3) re-verification based on feedback, and (4) announcement of final results.

What's new

- **Two-Catalog Parallel System:** The 2026 adjustment establishes a dual-track framework with parallel processes for the **Basic Medical Insurance Catalog** (covering basic medical insurance, maternity insurance, and workers' compensation insurance) and the **Commercial Insurance Innovative Drug Catalog** – a separate, non-mandatory recommended list for commercial health insurance products
- **Cross-Catalog Declaration**: Drugs that have already been included in the Commercial Insurance Innovative Drug Catalog may now simultaneously apply for the Basic Medical Insurance Catalog, creating a "commercial insurance first, basic insurance follows" pathway.

Drivers

- **"Commercial-First, Basic-Follows" Strategy**: With the formal establishment of the commercial insurance catalog as a bridge to basic insurance, companies with high-priced innovative drugs (e.g., CAR-T therapies, rare disease treatments, ultra-high-value ADCs) should prioritize commercial insurance catalog inclusion first. This pathway allows early patient access, real-world data accumulation, and price discovery before potentially transitioning to the basic insurance catalog in later years – without being forced into deep discounts at the initial launch stage.
- **"Dual-Declaration"**: For drugs that could potentially serve both basic and commercial insurance populations, the "dual declaration" strategy offers risk diversification. A drug that fails basic insurance inclusion may still succeed in the commercial insurance track, and vice versa.

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