COMPLIANCE ALERT - Transparency in Coverage

We are reaching out to inform you of an important, and timely, compliance requirement for employers that sponsor group medical plans. The **Transparency in Coverage (TiC)** rules include several provisions that impact your plan with a focus on providing transparency around costs of care. The major component that plan sponsors need to be aware of requires that they provide access to plan cost data in a Machine-Readable File (MRF) format. **The compliance date for providing access is July 1, 2022.**

This requirement applies to plan years beginning on or after January 1, 2022, and applies to all employers that sponsor a group medical plan, regardless of size. For plan sponsors, compliance with the rule is fairly simple, yet the requirement for public access to the information will be a new format for employers. Plans (employers) and issuers (insurers) must publicly disclose cost related information using MRFs, in the following three files:

1. **In-network Rate File** – Includes all in-network provider negotiated rates for covered items and services
2. **Allowed Amount File** – Includes historical allowed amounts and associated billed charges for covered items and services that are provided outside the plan network; and
3. **Prescription Drug File –** Negotiated pricing and historical net prices for covered prescription drugs *(delayed until further notice)*

All posted MRFs must be updated on a monthly basis. The MRFs, although containing important plan cost information, are not designed with the plan participant in mind. Files are formatted in machine languages that will allow state and federal authorities, as well as application developers, to easily access up-to-date data, provide analysis, and develop new cost transparency tools for consumers.

Plan sponsors will comply with this requirement by **posting access to the MRFs on their publicly accessible website**. Access can be in the form of a link to the MRF's on the issuer's site, or the files themselves. Due to the monthly updating requirements, we do not recommend attempting to post the actual files. Plan sponsors may also provide access to the files on an employee facing site, only if it is also posted on their public website. No fees can be charged to access the data files and no form of gatekeeping (e.g., password protection) is allowable. Regulations provide no requirements on where on your public website the access must be provided. The location for the link is up to the plan sponsor. Plan sponsors are not required to provide any notice to employees regarding posting of file access.

On the following page we have provided the relevant links for many of the regional and national insurers. If you are a sponsor of a self-funded plan these links will be provided by the administrator of your plans. **You will need to add a link to your publicly available website on, or before, July 1, 2022.**

In a future alert, we will be advising plans sponsors of a requirement to make internet-based cost comparison tools available to plan participants. This rule will be effective for plan years beginning on or after January 1, 2023.

More information regarding the rule is available on our website, ["Impending Deadline for Health Plans to Publish Machine-Readable Files"](). Please contact your OneDigital representative if you have any questions regarding this information.

MRF Links provided by plan issuers (insurers) and administrators for self-funded plans

Please note that some of the links below will not be active until July 1, 2022. Final regulations were released only recently, and the files are being built. Also, many of the landing pages will include files for more than one network. Plan sponsors are not required to indicate which network their particular plan uses as long as it is included on the site.

- Blue Cross and Blue Shield of Massachusetts - https://transparency-in-coverage.bluecrossma.com/
- Point32 Companies
    - Harvard Pilgrim Health Care - https://www.harvardpilgrim.org/public/machine-readable-files
    - Tufts Health Plan - https://tuftshealthplan.com/visitor/legal-notices/machine-readable-files
- Allways Health Partners - https://www.allwayshealthpartners.org/meet-us/transparency-regulations
- Health New England - PENDING
- United Healthcare - https://transparency-in-coverage.uhc.com/undefined
- CIGNA - https://www.cigna.com/legal/compliance/machine-readable-files
- Aetna – *Aetna will be providing a custom link for each plan sponsor. The link will be emailed to the plan contacts prior to July 1, 2022.*
- Blue Cross and Blue Shield of Rhode Island – PENDING
- Anthem – PENDING
- Health Plans, Inc. (HPI) - https://hpitpa.com/transparency-in-coverage-machine-readable-files/
- Blue Benefit Administrators (BBA) - https://www.bluebenefitma.com/employers/machine-readable-file-links

We will be updating this list as more issuers make their web access available. If you do not see the issuer for your plan listed, please contact your representative at OneDigital.