

Transparency in Coverage & Machine-Readable Files Updated 6.20.2022

The <u>Transparency in Coverage Final Rules</u> (the "TiC Final Rules") require non-grandfathered group health plans and health plan providers offering coverage to non-grandfathered groups and individual markets to disclose machine-readable files (MRFs) for:

- In-network provider rates for covered items and services; and
- Out-of-network allowed amounts and billed charges for covered items and services.

Enforcement for the MRFs begins July 1st, 2022.

The DOL issued an update in FAQ 49 which has postponed the Rx file requirement until further notice.

As https://www.govinfo.gov/content/pkg/FR-2021-11-23/pdf/2021-25183.pdf states, the Departments will not initiate enforcement action against a plan or issuer that does not report the required information by the first statutory deadline for reporting on December 27, 2021 or the second statutory deadline for reporting on June 1, 2022, and that instead submits the section 204 data submissions for the 2020 and 2021 reference years by December 27, 2022.

What you need to know:

- Healthgram will help all clients comply with this legislation by providing access to the required Machine-Readable Files by the 7/1/2022 enforcement date
- Clients and consultants will be able to access the necessary file(s) and link(s) to network websites to obtain the rate information by visiting: mrf.healthgram.com
 - **Please note:** Files will not become available until the 7/1/2022 enforcement date. So, while you can visit the website, you will not be able to view or access files until 7/1/2022
 - Clients can also visit <u>healthgram.com</u> or the <u>Employer</u>, <u>Member</u> or <u>Provider Portals</u> to access the <u>mrf.healthgram.com</u> website
- Healthgram is also working on the Rx requirements in anticipation of the 12/27/2022 deadline

For more information on the Transparency in Coverage legislation, visit: https://www.federalregister.gov/documents/2020/11/12/2020-24591/transparency-in-coverage