Machine-readable files posting requirements

The Transparency In Coverage act requires most non-grandfathered group health plans or health insurance issuers in the individual and group markets to make available to the public (consumers, researchers and third-party developers) three separate machine-readable files that include detailed pricing information. These files follow the Centers for Medicare & Medicaid Services' (CMS) defined layout and are in the CMS-approved format (JSON) and not meant for a consumer-friendly search of rates, benefits or cost sharing. The files must be updated monthly. The files must include

- negotiated rates for all covered items and services between the plan or issuer and in-network providers;
- historical payments to, and billed charges, from out-of-network providers; and
- *(DELAYED PENDING ADDITIONAL RULEMAKING)* in-network negotiated rates and historical net prices for all covered prescription drugs by plan or issuer at the pharmacy location level.

Files must be made public by July 1, 2022, for plan years that begin on or after January 1, 2022. (For example, plan years from January through July, must comply by July 1. August 1 plan years must have files posted by August 1.)

Issuers (carriers) vary in their interpretation of how plan sponsors meet this requirement. The table below summarizes the position of the respective carriers Bukaty Companies represents. Employers adding a carrier link to their website only need to establish the link once. Bukaty recommends adding the link in the footer of a company website so as not to interfere with business-related content. Recommended language and linked text to the respective carriers' websites are listed below in italic. Carrier links will remain constant and updated through the year.

CARRIER	FULLY INSURED	LEVEL-FUNDED	SELF-FUNDED
Aetna	No employer action needed.	No action needed for self-funded plan sponsors with fewer than 100 lives.	100-plus self-funded employers advised to post Aetna link to their website. Aetna self-funded groups have been sent a unique group-specific URL.
Anthem *https://www.anthem.com/machine-readable-file/search)*	No employer action needed.	No employer action needed.	Self-funded employers advised to post Anthem link to their website. *To access the machine-readable files created and published by Anthem, please click here.*
Blue Cross Blue Shield of Kansas *www.bcbsks.com/MRF*	No employer action needed.	Level-funded employers advised to post BCBSKS link to their website. *To access the machine-readable files created and published by Blue Cross Blue Shield of Kansas, please click here.*	ASO employers advised to post BCBSKS link to their website. *To access the machine-readable files created and published by Blue Cross Blue Shield of Kansas, please click here.*
Blue Cross Blue Shield of Kansas City *https://bcbskc.sapphiremrfhub.com/*	No employer action needed.	Level-funded employers advised to post BCBSKC link to their website. *To access the machine-readable files created and published by BlueKC, please click here.*	ASO employers advised to post BCBSKC link to their website. *To access the machine-readable files created and published by BlueKC, please click here.*
Cigna *https://www.cigna.com/legal/compliance/machine-readable-files*	Not applicable.	(Groups over 25+) Level-funded employers advised to post Cigna link to their website. *To access the machine-readable files created and published by Cigna, please click here.*	Self-funded employers advised to post Cigna link to their website. *To access the machine-readable files created and published by Cigna, please click here.*

CARRIER	FULLY INSURED	LEVEL-FUNDED	SELF-FUNDED
Cigna + Oscar *https://www.cigna.com/legal/compliance/machine-readable-files*	Fully insured employers advised to post Cigna + Oscar link to their website. *To access the machine-readable files created and published by Cigna + Oscar, please **click here**.*	Not applicable.	Not applicable.
Humana *https://developers.humana.com/cost-transparency*	No employer action needed. Humana will post MRFs for its fully insured groups to a public facing website.	No employer action needed. Humana will publish these files on their publicly available website, fulfilling the requirement on behalf of the self-insured groups.	No employer action needed. Self-insured plans can link to their plan's information through the Humana website, or download the information and make their own arrangements to host the information.
National General (Allstate) *S365 MRF Hub (sapphiremrfhub.com)*	Not applicable.	No employer action needed. Employers will not have to post on their websites as long as the machine-readable files are posted on the Allied website. (Allied is the TPA for National General (Allstate).	Not applicable.
Trustmark *https://mrf.healthcarebluebook.com/trustmarksb*	Not applicable.	Level-funded employers advised to post Trustmark link to their website. *To access the machine-readable files created and published by Trustmark, please **click here**.*	Not applicable.
UnitedHealthcare *https://transparency-in-coverage.uhc.com*	No employer action needed.	Level-funded employers advised to post UHC link to their website. *To access the machine-readable files created and published by UnitedHealthcare, please **click here**.*	Self-funded employers advised to post UHC link to their website. *To access the machine-readable files created and published by UnitedHealthcare, please **click here**.*

BUKATY COMPANIES

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