



TO: Our Valued Clients and Brokers
FROM: Health Plans, Inc.
DATE: February 24, 2023
RE: Compliance eBlast: RxDC Submission 2023 and an Air Ambulance Reporting Update

Health Plans, Inc. (HPI) is issuing this Compliance *eBlast* to notify you of HPI's Prescription Drug Data Collection (RxDC) Reporting process for 2023 and to update you on a delay in the Air Ambulance Reporting deadline.

RxDC Reporting for 2023

As we communicated in our recent January 25, 2023 *e-Blast* found [here](#) , HPI filed 2020 and 2021 RxDC submissions on December 21, 2022 which included a Plan List (P2), a Medical Expense Report (D2), and associated Narrative documentation.

As a refresher now that the first RxDC reporting cycle has closed, the RXDC Report is due June 1 each year and must contain data for the previous calendar year.

- Data Elements:
 - o The reporting requirements include information which is intended to identify the major drivers of increases in prescription drug and healthcare costs to allow for increased understanding of how prescription drug rebates impact premiums and out-of-pocket costs and to increase the transparency of prescription drug pricing. See our September 9, 2022 Regulatory Affairs and Action *Update* found [here](#) for more information about the data elements.
- Required Data Files: The following data files are required to meet the reporting obligations:
 - o P2 Plan List
 - o D1 Premium and Life Years Data
 - o D2 Spending by Category Data
 - o D3 – D8 PBM Rx Data (consists of 6 separate Rx Data files)

How RxDC Data Will be Submitted for 2023

As in 2022, the reporting and submission of the required data files will be a joint effort between the client, the client's pharmacy benefit manager (PBM) and HPI.

- **The following processes will be the same as used in 2022:**
 - o Clients' PBMs will complete and provide the D3 –D8 *PBM Rx Data* files to either the client or directly to CMS.
 - o HPI will complete and submit the D2 *Spending by Category Data* file aggregated by our book of business directly to CMS on our clients' behalf. This will allow clients' PBMs to submit their D3 through D8 files on an aggregated basis to CMS, if the PBM chooses to do so.
 - o HPI will complete and submit the P2 *Plan List* file for our book of business directly to CMS; however, we will again need some information from clients to populate the P2 files. **Please see the below Action Required section regarding the attached P2 Plan List Data Survey.**

- **The following new process will be added for 2023:** HPI has updated our reporting process for a more inclusive data submission and enhanced reporting simplification.
 - o HPI will aggregate and submit the D-1 Premium and Life Years file at no cost for all clients who opt in for this service and supply the required data by our April 15th deadline. Please note: If the client opts in and requests HPI to submit their D1 data, incorporated into HPI's block of business aggregated D1 file, *HPI will use the data reported by the client and HPI will not be liable for incorrect data*. For information on how to opt in, **please see the "Required Client Action" section below**.
 - o If a client does not opt in for HPI to produce and submit the D-1 Premium and Life Years files, the client will need to submit their D1 (Premium and Life Years) file directly to CMS.

Required Client Action

All clients for whom HPI administered their medical benefit plans in calendar year 2022 must complete and return the attached RxDC Data Collection Survey to RegulatoryReporting@healthplansinc.com **no later than April 15, 2023**. Please note this survey includes the option for clients to opt in and provide the needed data for HPI to submit the D-1 Premium and Life Years on a client's behalf.

Air Ambulance Reporting Update

As we communicated in our recent January 25, 2023 *e-Blast* found [here](#), Section 106 of the No Surprises Act requires health plans and health insurance issuers to disclose certain data to the Department of Health and Human Services (HHS) regarding the use of air ambulance services. HHS and CMS (The Departments) issued proposed regulations implementing Section 106 regarding these required disclosures on 9/16/2021.

At this time, The Departments have not, yet, issued the final rule on air ambulance reporting. The proposed regulation had required plans and issuers to submit air ambulance reporting and claims data for the 2022 plan year by 3/31/2023, and for the 2023 plan year by 3/30/2024. However, since the proposed regulations have yet to be finalized, and the 3/31/2023 filing date is arriving soon, Department Officials at CMS indicated last week that the reporting deadlines in the proposed rule will not go into effect on 3/31/2023 and new reporting deadlines will be set in the final rule -- which may be released later this year. HPI will issue further communication concerning Air Ambulance Reporting as we learn more.

Please contact your HPI Account Service Team directly if you have any questions.

Please return the RxDC Data Collection Survey to RegulatoryReporting@healthplansinc.com.

Regards,

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The information in this Compliance *eBlast* is intended to provide a summary of our understanding of recent regulatory developments which may affect our clients' plans. It should not be construed as specific legal advice or legal opinion.