

Transparency in Coverage FAQ: Machine-Readable Files

As part of our ongoing work to improve access to pricing information and as required under the new Transparency in Coverage rule, Blue Cross & Blue Shield of Rhode Island (BCBSRI) is making machine-readable files with provider payment information available beginning on July 1, 2022. These files will be created internally, updated monthly, and posted to bcbsri.com/developers.

What does the Transparency in Coverage rule require?

The Transparency in Coverage rule requires that plans make separate machine-readable files available on a publicly accessible website showing (1) negotiated in-network provider rates for all covered items and services; and (2) historical payments to, and billed charges from, out-of-network providers. The Departments of Labor, Treasury, and Health and Human Services (collectively the Tri-Agencies) have delayed the implementation of a third required file showing the in-network negotiated rates and historical net prices for all covered prescription drugs at the pharmacy location level. This requirement is on hold pending additional guidance.

In addition, there are requirements for plans to make personalized out-of-pocket cost information and negotiated rates available to plan participants over the course of the next few years. BCBSRI will be providing updates on those requirements later this year.

Whom does this rule apply to?

The rule applies to health insurance companies and self-funded group health plan sponsors.

When is the machine-readable files requirement effective?

The machine-readable file requirement is effective beginning July 1, 2022.

What is a machine-readable file?

A machine-readable file (MRF) is defined by the regulation as a digital representation of data or information in a file that can be imported or read by a computer system for further processing without human intervention, while ensuring no semantic meaning is lost.

What data will be available in the MRFs?

The MRFs will contain the in-network rates and out-of-network historical amounts for the data that we administer and BlueCard pricing. If you carve out certain benefits to a third-party vendor, then you

should work with that vendor to understand their solution for those services.

For the out-of-network MRFs, in accordance with the regulations, the file will only include pricing for services for which we have more than 20 claims for that service paid in the last 90-day period that begins 180 days prior to the publication date of the MRF.

How often will the files be updated?

The files will be updated and posted monthly.

What is the format of the MRFs?

The BCBSRI files will be in JSON format.

All machine-readable files must be made available via HTTPS. MRFs must be in a non-proprietary, open format, such as JSON, YAML, or XML. They cannot be in PDF or XLS/XLSX because those are proprietary formats that do not meet the definition of a machine-readable file. For more information about the format of these files and the requirements for what they must contain, see github.com/CMSgov/price-transparency-guide.

How do I access the files?

The files will be posted to bcbsri.com/developers beginning on 7/1/2022.

Will you send employers the files on a monthly basis?

No, due to file size and complexities, the MRFs will only be available on our public website. We will begin posting the files on July 1, 2022, and they will be updated monthly thereafter.

You can access them at bcbsri.com/developers. Self-funded groups: You can post this URL on your website.

Are there any additional fees to employers to get the MRFs?

No.

Are members able to access the MRFs?

Anyone can visit our website and access these files. However, the MRFs are not intended for member consumption. Members who want to review pricing for specific services or providers should log in to their myBCBSRI.com account to use our pricing tools.

Where can I find the technical specifications for the MRFs?

For information regarding the technical specifications for the files, see github.com/CMSgov/price-transparency-guide.

Will there be future changes to the MRFs?

Given the complexities in creating these files and the various pricing methods used by insurance carriers throughout the country, we do anticipate that the Tri-Agencies will refine the technical guidance and may make changes in the future. BCBSRI is committed to ensuring ongoing compliance with these regulations and will work to implement any necessary changes in the future.

How does BCBSRI plan to comply with the future Transparency in Coverage pricing tool requirements?

BCBSRI will continue to work diligently to ensure that our pricing tool is brought into compliance with this regulation. We will provide more information later this year.

This FAQ is provided for informational purposes only and is not intended as legal or tax advice. Please consult your legal counsel or tax advisor before acting on any information in this summary.