

EMI Health Transparency in Coverage

On November 12, 2020, the Federal government issued the Transparency in Coverage (TiC) see below for the changes.

Under this Rule, group health plans must create and publish machine-readable files (MRFs) that contain detailed pricing information, including:

1. Network negotiated rates for all items and services.
2. Historical payments to, and billed from charges from, out-of-network providers.

A machine-readable file (MRF) is 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. These files follow the Centers for Medicare & Medicaid Services (CMS) defined layout and are in the CMS-approved format (JSON). These files are not meant for a consumer-friendly search of rates, benefits, or cost-sharing.

According to the CMS, the primary intent for releasing these cost data files is to provide opportunities for detailed research studies and data analysis, as well as offer third-party developers and innovators the ability to create private-sector solutions to help drive additional price comparison and consumerism in the health care market.

Group health plans are required to make these files available to the public from an open-access internet website effective July 1, 2022.

How EMI Health will support its clients:

- By July 1st, EMI will create and publish the MRFs for the medical plans that EMI administers (at this time the pharmacy MRF are delayed pending additional rulemaking).
- EMI will host the files on each client's behalf to a publicly accessible MRF Hub website at <https://emihealth.com/machinereadables> and will update the files on the first of each month.
- Note, the link will not be active until July 1, 2022.

What Employers need to do:

To ensure the Group Health Plan is in compliance with the TiC MRF Rule requirement, Employers should be prepared to post the MRF Hub website link on their own company's public-facing website (not on an internal site or benefits portal where it is available solely to the employees or plan participants). There is no formal guidance on how or where the link should be displayed on the website.

If you have any questions, please don't hesitate to contact EMI Health.