

Machine Readable Files - Frequently Asked Questions

Table of Contents

Table of Contents	1
Audience.....	1
Acronyms.....	1
FAQs	2
1.0. Requirements	2
1.1. What are the TIC MRF requirements?.....	2
1.2. Weren't there originally three MRFs requiring publishing, not two?	2
1.3. When must the MRFs be publicly available?	2
1.4. My plan year is after January 1, 2022. Will my plan information be included in the MRFs?.....	2
2.0. Files and Data	3
2.1. My plan's OON MRF is empty (doesn't contain any rates). Does that mean that my plan has had no OON utilization?	3
2.2. My client has other plans that HMA doesn't administer. Will that data be included in the MRFs that HMA produces.....	3
2.3. Can I download the MRFs and look at them myself manually? Will HMA help me decipher the contents?.....	3
2.4. I'm a new client to HMA. Will the MRFs include data from my previous carrier?	3
2.5. I have direct contracts with certain providers/vendors, with different fee schedules. Will their data be included in my INN MRF?	4
2.6. Will HMA host MRFs for clients post-termination?	4
2.7. How long will HMA retain MRFs?.....	4
2.8. Can I download MRFs in bulk, for example, for HMA's entire book of business?.....	4
3.0. Websites and Links	4
3.1. Will HMA host the required MRFs on behalf of its plan groups?.....	4
3.2. Where will HMA publish the MRFs? On HMA's existing public website?	4
3.3. Do I need to add a link on my website to where HMA hosts the MRFs?	4
3.4. When will HMA publish the MRFs to its public website?.....	4
3.5. Who will be able to access the website where the MRFs will be hosted?.....	4
3.6. Will HMA send me a copy of the MRFs? Do I need to host the MRFs on my own site?	4
3.7. Will HMA have a separate link for each MRF?	5
4.0. Financial.....	5
4.1. Is there a fee for producing my MRFs?	5
5.0. Support.....	5
5.1. Who do I contact for support?	5

Audience

Clients/employers and brokers of Healthcare Management Administrators (HMA).

Acronyms

INN: In Network

MRF: Machine-Readable File

OON: Out of Network

TIC: Transparency in Coverage

FAQs

1.0. Requirements

1.1. What are the TIC MRF requirements?

On November 12, 2020, the Departments of Health and Human Services, Labor, and the Treasury (the "Departments") finalized the Transparency in Coverage Rule that requires health insurers to create and post publicly available MRFs that include INN negotiated payment rates and historical OON allowed rates for covered items and services. In addition:

- The MRFs must be available on a public website
- The MRFs must be updated monthly

Note: The Departments consider "monthly" to refer to reasonably consistent periods of approximately 30 days, but aren't specifying a particular day of the month.

- The MRFs must be accessible free of charge
- The site can't require the user to establish a user account, password, or other credentials
- The site can't require the user to submit any personal identifying information such as a name, email address, or telephone number

Plans have flexibility to publish the files in the locations of their choosing based upon their knowledge of their website traffic and the website location where the MRFs would be readily accessible by the intended users.

1.2. Weren't there originally three MRFs requiring publishing, not two?

The original TIC mandate released 1/11/2021 included three MRFs:

- INN Rate File
- OON Allowed Amount Rate File
- Prescription Drug Cost File

However, in July of 2021, CMS deferred the Prescription Drug Cost File indefinitely, pending additional rulemaking. The rationale behind deferring and potentially removing the Prescription Drug Cost file is due to overlapping requirements. There is currently a mandate for reporting prescription drug costs that would make this file redundant. Should the Prescription Drug Cost File requirement be reinstated, HMA will keep you apprised on what to expect.

1.3. When must the MRFs be publicly available?

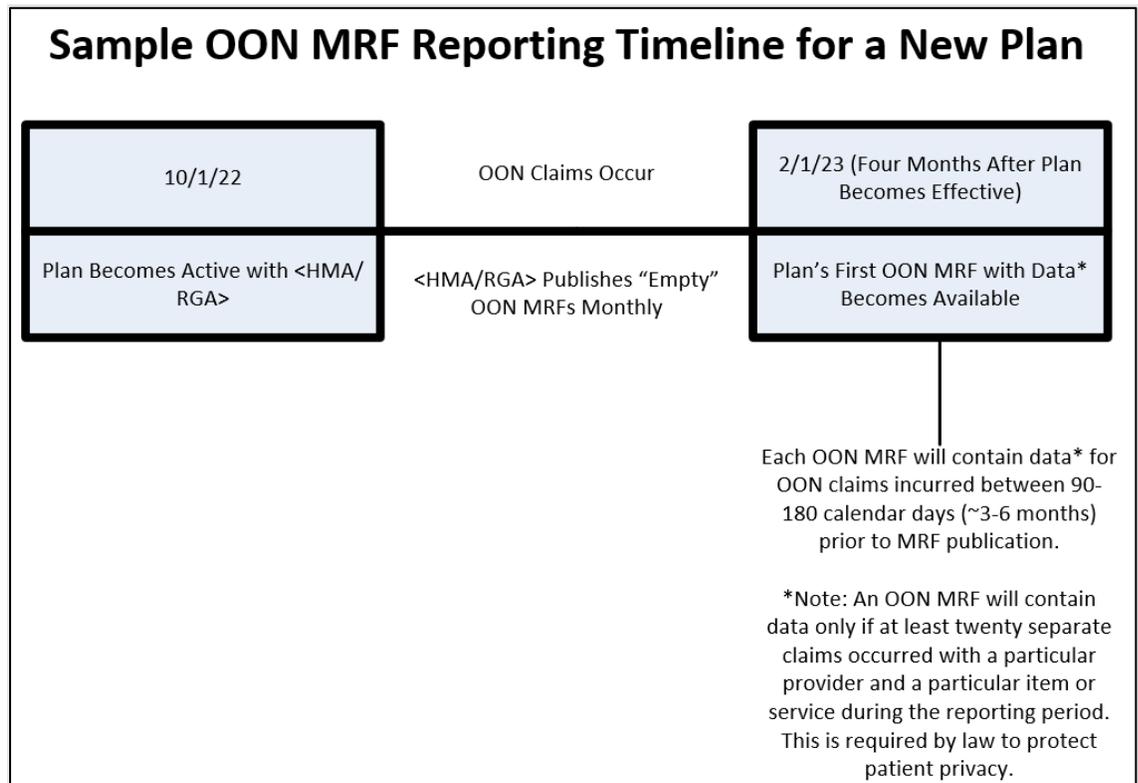
The MRFs must be publicly available by July 1, 2022 for plan years that begin on or after January 1, 2022. Based on the technical guidance issued by the Centers for Medicare and Medicaid Services (CMS), the MRFs cannot be in PDF or Excel document formats. HMA is using JSON as the public file format as provided by CMS through the TIC GitHub.

1.4. My plan year is after January 1, 2022. Will my plan information be included in the MRFs?

The MRFs will include information only for plan years that became active or renewed on or after January 1, 2022.

- If your plan hasn't yet become active with HMA, then your plan information won't be included in the MRFs until after your plan becomes active, as follows:
 - For INN MRFs, this will be within approximately one month after your plan becomes active with HMA.
 - For OON MRFs, this will be once your plan has reached the required reporting timeline. Because this reporting timeline is approximately 3-6 months in the past and MRFs are produced monthly, it takes

approximately 4 months after your plan becomes active with HMA for OON data to start showing up. Until then, your OON MRF may be “empty” (not contain any rates). For example, here is a sample timeline:



- If your plan is active but hasn’t yet renewed with HMA (for example, if your plan renews on October 1, 2022), then your plan information won’t be included in the MRFs until after your plan renews. For both INN and OON MRFs, this will be within approximately one month after your plan renews.

2.0. Files and Data

2.1. My plan’s OON MRF is empty (doesn’t contain any rates). Does that mean that my plan has had no OON utilization?

Not necessarily, as there’s a minimum threshold for reporting. If your plan hasn’t incurred at least 20 separate OON claims with a particular provider and a particular item or service during the reporting period of 90-180 calendar days (~3-6 months) prior to the MRF publish date, then HMA is required to not disclose the OON allowed amount data. This is to protect patient privacy.

2.2. My client has other plans that HMA doesn't administer. Will that data be included in the MRFs that HMA produces.

No. The MRFs will include data only for plans that HMA administers. It is up to you to coordinate with any other plan administrators you may have.

2.3. Can I download the MRFs and look at them myself manually? Will HMA help me decipher the contents?

Please note that the mandate specifies the files must be "machine-readable", not "human-readable". You can download the files, but in order to understand them you'll need software that can read JSON files. HMA won't be providing this software nor will it be helping users decipher the contents in the files.

2.4. I’m a new client to HMA. Will the MRFs include data from my previous carrier?

No. The MRFs that HMA produces on your behalf will contain data only for plans that HMA administers.

2.5. I have direct contracts with certain providers/vendors, with different fee schedules. Will their data be included in my INN MRF?

These aren't technically "networks" and, as such, aren't required to be listed in the INN MRFs. HMA is assessing the lift to include this information in your INN MRFs and will provide updates as things progress.

2.6. Will HMA host MRFs for clients post-termination?

Your last active file(s) will be publicly available for up to three months after your termination date.

2.7. How long will HMA retain MRFs?

Internally, HMA will store MRFs for up to three months after they were initially created. However, please note that only the most recent month's MRFs will be available publicly. HMA won't be displaying historical MRFs publicly or providing them by request.

2.8. Can I download MRFs in bulk, for example, for HMA's entire book of business?

No. The website will allow only one client's MRFs to be downloaded at a time.

3.0. Websites and Links

3.1. Will HMA host the required MRFs on behalf of its plan groups?

Yes, HMA will create, generate, and publish MRFs on behalf of the client groups for which HMA has rates in its systems. For OON MRFs, please note that they may be "empty" (not contain any rates) if your plan hasn't incurred the minimum number of OON claims during the reporting period. This is required in order to protect patient privacy

3.2. Where will HMA publish the MRFs? On HMA's existing public website?

The MRFs will be posted on a separate publicly available site hosted by HMA, which will be available by July 1, 2022. A link to this site will be added to HMA's existing public website at accesshma.com.

[Here](#) is the direct link that employers can post on their website to satisfy the Plan's obligation to post their MRFs.

Note: If you attempt to access the link prior to July 1, 2022, it may not be available or you may receive an error message. Please check back on or after July 1, 2022.

3.3. Do I need to add a link on my website to where HMA hosts the MRFs?

Yes, you are required to post a link on your public website to where HMA hosts your MRFs. If you don't have a public website, HMA recommends you discuss the requirement with your company's legal counsel. Please note that HMA won't create a website for your company.

3.4. When will HMA publish the MRFs to its public website?

HMA will have our public MRF website live by July 1, 2022. At this time, our network partners are signaling delivery of INN MRF data to us on July 1, 2022. HMA will have all files posted as quickly as possible on or after July 1, 2022.

3.5. Who will be able to access the website where the MRFs will be hosted?

Anyone with Internet access, per the TIC mandate. Please note, however, that users will need to know at least three consecutive digits of an client's Employer Identification Number (EIN) in order to look up and download that client's MRFs.

3.6. Will HMA send me a copy of the MRFs? Do I need to host the MRFs on my own site?

HMA won't send you a copy of the MRFs. HMA will host the files on its own public website [here](#). You may download the MRFs from there if you want, but since HMA is already hosting them on your behalf, you aren't required to download the files or post them on your own site. You are required, however, to post a link on your website to where HMA hosts the MRFs.

3.7. Will HMA have a separate link for each MRF?

No. All MRFs will be hosted on a single page [here](#).

4.0. Financial

4.1. Is there a fee for producing my MRFs?

In 2022, 2023, and 2024, self-funded health plans are subject to multiple new and ongoing and new transparency-related federal regulatory requirements. These requirements represent a massive technology lift and investment. We are passing through only a portion of the real costs of delivering on these requirements.

5.0. Support

5.1. Who do I contact for support?

Please contact your Account Manager.