



Regulatory Update: Payer Transparency Machine-readable Files & Self-Funded Group Approach

Thursday, May 12, 2022

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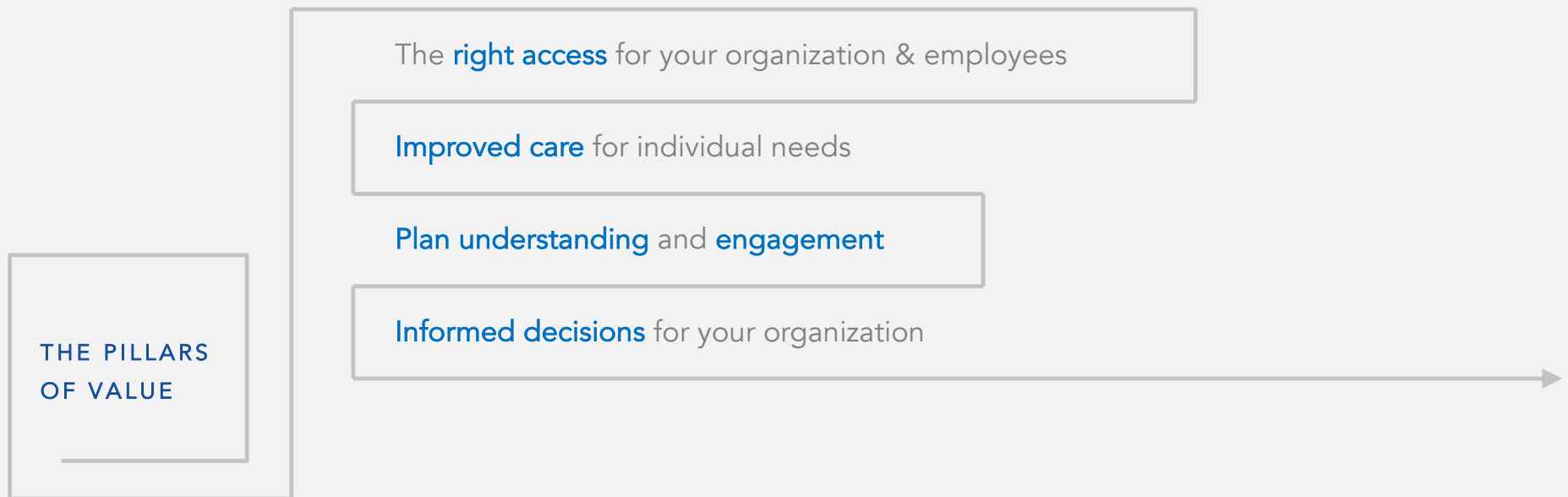
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This document is intended to build awareness and understanding of potential changes and issues related to the future regulatory environment for health care. This document is to be used as an educational tool only - it is not intended to provide predictions of future outcomes, comprehensive implications, or to impart tax or legal advice. Further, the information contained in this document is only informed as of the date of its creation and does not replace a more rigorous review of additional guidance pending from the federal or state government.

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Agenda

To present how Blue Cross is implementing the Transparency in Coverage Machine-Readable File mandate and how we are assisting self-funded groups

- ✓ Review summary of regulation and approach
- ✓ Review fully insured group approach
- ✓ Review self-funded group approach
- ✓ Next steps
- ✓ Q & A
- ✓ Updates on other Regulations

BACKGROUND

Starting on July 1, 2022, plans and issuers must make public two* machine-readable files that display the following:

- **In-network File:** All applicable rates (including negotiated rates, underlying fee schedules, or derived amounts) with in-network providers for all covered items and services
- **Allowed Amount File:** Billed charges and allowed amounts for covered items and services provided by out-of-network providers

*** Please note the Pharmacy file has an enforcement delay until additional federal guidance is released**

Regulatory Summary and Approach



BLUE CROSS FULLY INSURED

The link to Blue Cross and Blue Care Network's machine-readable Files will be on BCBSM.com

Action: NONE

SELF-FUNDED GROUPS

A link to a URL site with the group's MRFs will be available on the group portal. The URL will not change and the MRFs will be managed and updated on a monthly basis by Blue Cross's vendor

Action: Self funded groups should copy that link and add it to their own public website

WHAT IS NOT INCLUDED ?

- Medicare/Medicare Advantage/ Medicaid
- Grandfathered plans
- Stand Alone Dental
- Stand Alone Vision
- Excepted benefits*
- HRAs and short-term limited duration plans,

IMPORTANT:

If you have benefits carved out of Blue Cross, these benefits will not be included in the MRFs produced by Blue Cross. You will need to contact the entities responsible for administering those benefits for further assistance.

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Machine-readable Files-
**Fully Insured
Groups**



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BCBSM Summary of Approach – Fully Insured Groups



How is Blue Cross implementing Transparency in Coverage for Fully Insured groups?



Blue Cross will make publicly available: in-network negotiated rates and out of network allowed amount files on BCBSM.com which will be updated monthly.

The screenshot shows the BCBSM website interface. In the 'Help and Information' section, the link 'Documents and Forms' is highlighted with a red box. A blue arrow points from this link to a larger, detailed view of the website's footer. The footer contains the following sections:

- Michigan Health Insurance**
 - Individual and Family Plans
 - Dental Plans
 - Medicare
 - Medicaid Plans
 - Employers
- Get a Quote**
 - Apply Now
 - Request a Callback
- Help and Information**
 - Find a Doctor or Hospital Contact
 - Frequently Asked Questions
 - Documents and Forms**
 - Language Assistance
 - Nondiscrimination Notice
 - Health Care Reform
 - About ACA Plans
 - Stop Fraud
- I am a...**
 - Blue Cross Member
 - Insurance Shopper
 - Employer
 - Provider
 - Agent
 - Supplier
- About Us**
 - Our Company
 - Our Mission
 - Careers
 - Diversity
 - Media Resources
 - Code of Conduct

At the bottom of the footer, there is a 'Related Pages' section with links to 'Buying Health Insurance', 'How do deductibles, coinsurance and copays work?', and '2021 Medicare Advantage Plans'.

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BCBSM Summary of Approach – Fully Insured Groups Cont.



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Payer Transparency Machine-readable Files

Table of Contents Format

```

1 {
2   "reporting_entity_name": "medicare",
3   "reporting_entity_type": "medicare",
4   "reporting_structure": [{"
5     "reporting_plans": [{"
6       "plan_name": "medicaid",
7       "plan_id_type": "hios",
8       "plan_id": "1111111111",
9       "plan_market_type": "individual"
10    }],
11    "plan_name": "medicare",
12    "plan_id_type": "hios",
13    "plan_id": "0000000000",
14    "plan_market_type": "individual"
15  }],
16  "in_network_files": [{"
17    "description": "in-network file",
18    "location": "https://www.some_site.com/f
19  }],{
20    "description": "behavioral in-network st
21    "location": "https://www.some_site.com/f
22  }],
23  "allowed_amount_file": {
24    "description": "allowed amount file",
25    "location": "https://www.some_site.com/f
  
```

.Json File Format

```

1 {
2   "reporting_entity_name": "cms",
3   "reporting_entity_type": "cms",
4   "plan_name": "medicaid",
5   "plan_id_type": "hios",
6   "plan_id": "1111111111",
7   "plan_market_type": "individual",
8   "last_updated_on": "2020-08-27",
9   "version": "1.0.0",
10  "in_network": [{"
11    "negotiation_arrangement": "capitation",
12    "name": "Primary Care Capitation",
13    "description": "Typical items and services for a primary care provider",
14    "billing_code_type": "CPT",
15    "billing_code_type_version": "2020",
16    "billing_code": "27447",
17    "negotiated_rates": [{"
18      "provider_groups": [{"
19        "npi": [1111111111, 2222222222, 3333333333, 4444444444, 5555555555],
20        "tin":{
  
```

Summary of Mandate:
According to Transparency in Care Act, public machine-readable files include allowed amounts and historical charges.

Instruction:
To access Blue Cross Shield of Michigan machine-readable files include allowed amounts and historical charges.

Warning: These files may be large (up to 1TB) and may result in performance issues resulting in slow download times depending on file size and hardware configuration.

[<Link>](#)

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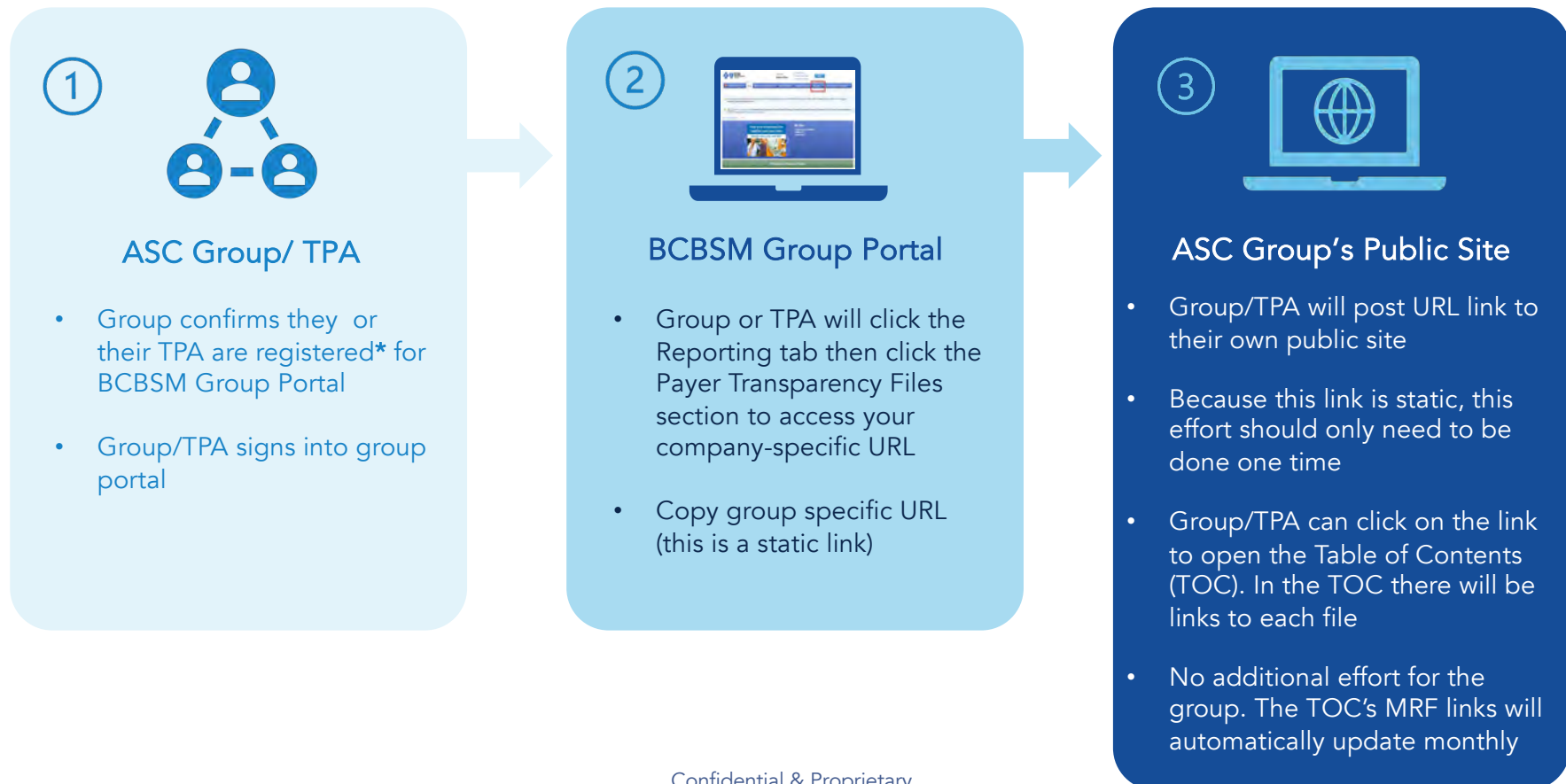
Machine-readable Files- Self-funded Groups



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3 steps for Self-funded Groups to prepare for 7/1/22



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First step for Self-funded groups – Group

Blue Cross's data will be made accessible to groups by signing into Group Portal. Only registered groups, group admins and/or TPAs can sign into the group portal.

1



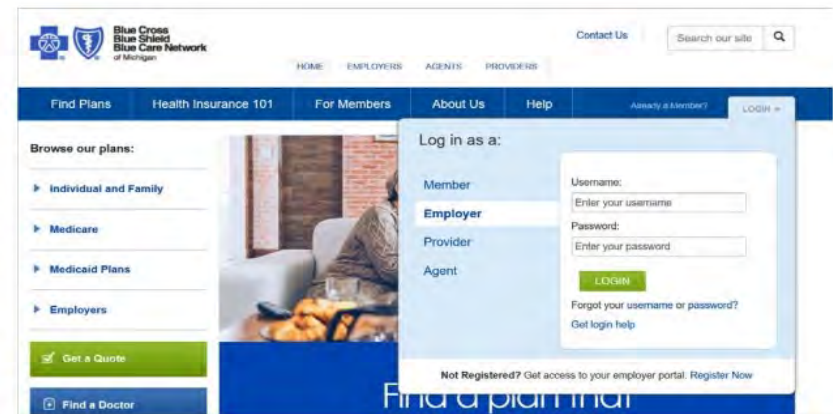
ASC Group/ TPA

- Group confirms they or their TPA are registered* for BCBSM Group Portal
- Group/TPA signs into group portal

Instruction under
Users Guides here:
[www.bcbsm.com/portal/
group_help.shtml](http://www.bcbsm.com/portal/group_help.shtml)

As a user, there are several tasks you can perform from the Login screen at BCBSM.com. The tasks you can perform are listed below:

- Registering for Secured Services - Principal Administrators
- Resetting your password
- Recovering your user name



Task 1 Registering for Secured Services - Principal Administrators

As an Administrator, you can register for access to Secured Services as a group, agent, or association/chamber.

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Second step for Self-funded groups- Copy URL

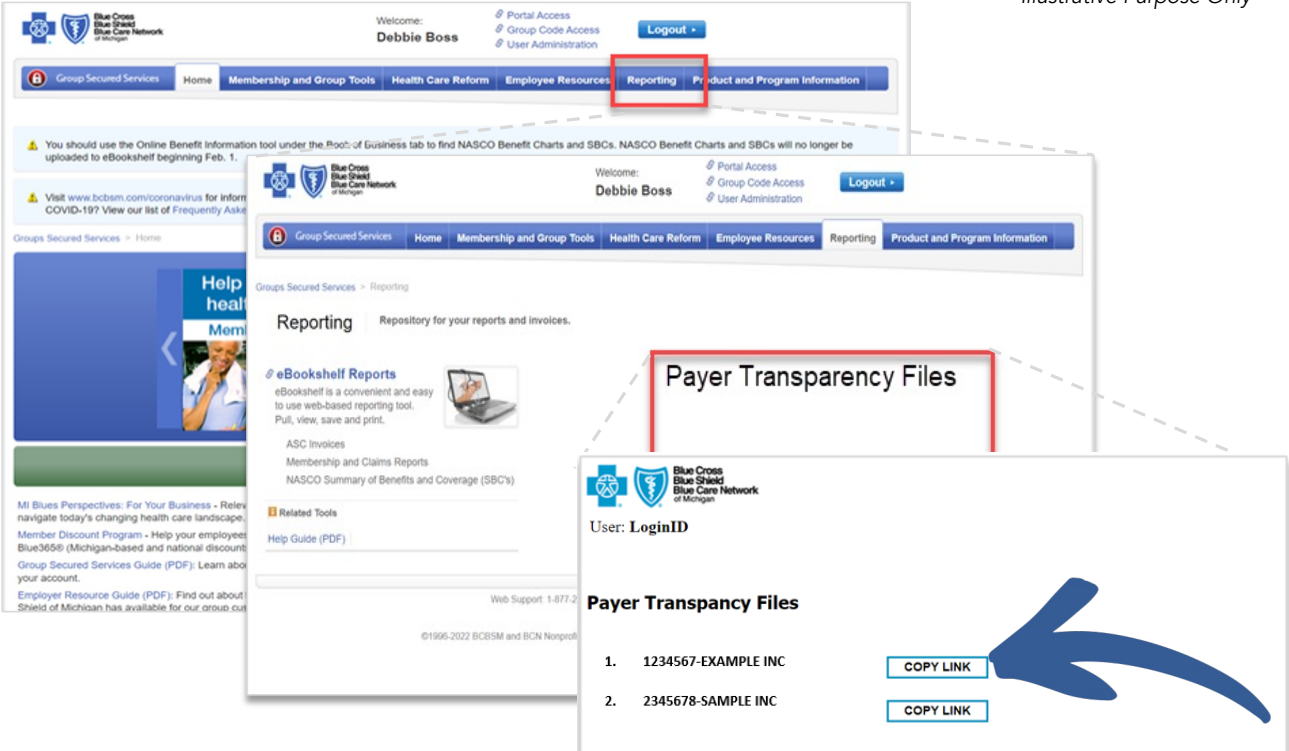
Illustrative Purpose Only

2



BCBSM Group Portal

- Group or TPA will click the Reporting tab then click the Payer Transparency Files section to access your company-specific URL
- Copy group specific URL (this is a static link)



The screenshot shows the BCBSM Group Portal interface. The 'Reporting' tab is highlighted in the top navigation bar. A red box highlights the 'Reporting' tab in the top navigation bar. A red box highlights the 'Payer Transparency Files' section in the main content area. A blue arrow points to the 'COPY LINK' button next to the first entry in the 'Payer Transparency Files' list.

Reporting Repository for your reports and invoices.

eBookshelf Reports
eBookshelf is a convenient and easy to use web-based reporting tool. Pull, view, save and print.

ASC Invoices
Membership and Claims Reports
NASCO Summary of Benefits and Coverage (SBC's)

Related Tools
Help Guide (PDF)

Web Support 1-877-2

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User: LoginID

Payer Transparency Files

1. 1234567-EXAMPLE INC [COPY LINK](#)
2. 2345678-SAMPLE INC [COPY LINK](#)

Sample link (for your website): [Bcbm.sapphiremrhub.com/DAISY_MAY_FARM_SANCTUARY](https://bcbm.sapphiremrhub.com/DAISY_MAY_FARM_SANCTUARY)

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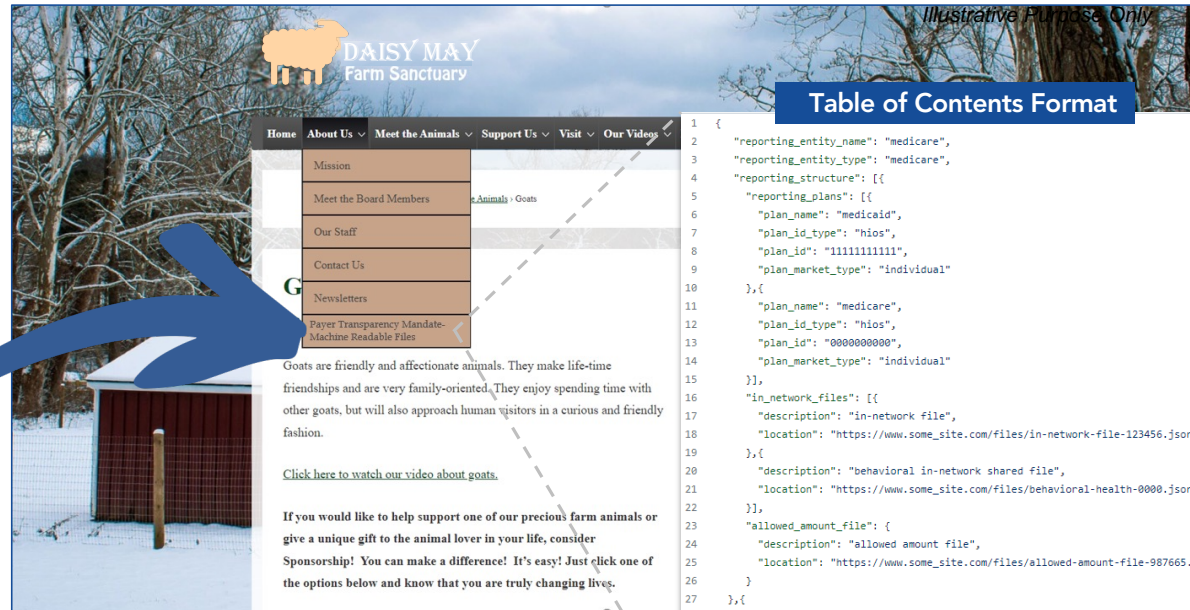
Third step Self-funded groups – Public Site

3



ASC Group's Public Site

- Group/TPA will post URL link to their own public site
- Because this link is static, this effort should only need to be done one time
- Group/TPA can click on the link to open the Table of Contents (TOC). In the TOC there will be links to each file
- No additional effort for the group. The TOC's MRF links will automatically update monthly



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Your group will need to consider the following:

- Public website
- Placement within the site
- Adding description and/or instruction
- Adding a disclaimer or warning message relating to downloading data and data size

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Third step for Self-funded groups – In-network single plan sample of .Json



Illustrative Purpose Only

```
1  {
2    "reporting_entity_name": "cms",
3    "reporting_entity_type": "cms",
4    "plan_name": "medicaid",
5    "plan_id_type": "hios",
6    "plan_id": "1111111111",
7    "plan_market_type": "individual",
8    "last_updated_on": "2020-08-27",
9    "version": "1.0.0",
10   "in_network": [{
11     "negotiation_arrangement": "capitation",
12     "name": "Primary Care Capitation",
13     "description": "Typical items and services for a primary care provider",
14     "billing_code_type": "CPT",
15     "billing_code_type_version": "2020",
16     "billing_code": "27447",
17     "negotiated_rates": [{
18       "provider_groups": [{
19         "npi": [1111111111, 2222222222, 3333333333, 4444444444, 5555555555],
20         "tin": {
21           "type": "ein",
22           "value": "11-1111111"
```

```
23   }
24 }, {
25   "npi": [1111111111, 2222222222, 3333333333, 4444444444,
26     "tin": {
27       "type": "ein",
28       "value": "22-2222222"
29     }
30   }],
31   "negotiated_prices": [{
32     "negotiated_type": "negotiated",
33     "negotiated_rate": 20000.00,
34     "expiration_date": "2022-01-01",
35     "billing_class": "institutional"
36   }]
37 }, {
38   "provider_groups": [{
39     "npi": [6666666666, 7777777777, 8888888888, 9999999999],
40     "tin": {
41       "type": "ein",
42       "value": "22-2222222"
43     }
44   }],
45   "negotiated_prices": [{
46     "negotiated_type": "negotiated",
47     "negotiated_rate": 25000.00,
48     "expiration_date": "2022-01-01",
```

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Key Considerations for Self-funded Groups

- All Self-funded groups have the ability to access Group Portal and will use the portal to access MRF group specific URL
- Appointed TPA on behalf of Self-funded groups, can also access Group Portal
- URL links to a Table of Contents containing additional links to the group's files
- Files are hosted by Blue Cross via contracted vendor and BCBS Association
- **Self-funded groups who have carved out benefits should work with the entities administering those benefits to collect data/files**
- ASC groups will download their URL from Group Portal and post on their public site. The URL is static and does not require further maintenance




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Group *Next Steps*

- 1 Confirm your group or TPA is registered for Group Portal
- 2 You may want to appoint someone in your company to oversee your machine-readable files
- 3 Determine if your group has benefit carve outs. If yes, additional files will need to be obtained from those entities
- 4 Determine website and placement for your BCBSM MRF link(s)
- 5 Work with your legal counsel to determine additional steps such as inclusion of instruction or disclaimer language



Be on the
look out
for:

- Announcement of group specific link issuance timing
- Announcement of link issuance on Group Portal
- Monthly schedule for file release
- Announcements of regulatory changes as they are released

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Questions?

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Regulatory Update-
+ **Nonopioid Directive**
+ **Autism Spectrum
Disorder Services Age
Limit**



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Regulation Update: State Bill- Nonopioid Directive Form



This state bill requires insurers to provide a copy of the form upon enrollment and post the form on their website. The form is also currently available to the public on the MDHHS website.

Public Act 43:

The form must be available on an insurer's website by April 1st, 2022

BCBSM Approach:

The form is available on BCBSM website: [Health and Well-Being | Members | bcbsm.com](https://www.bcbsm.com/index/members/health-well-being/members/bcbsm.com)

(Scroll down and click Nonopioid Directive Form under the Directives heading)

Public Act 42:

The form must be provided at enrollment by July 1st, 2022

BCBSM Approach:

- New member enrollment will include form

Self-funded Group Recommendation

For those Self-funded groups that **offer their own enrollment material instead of receiving Blue Cross enrollment kits**, should include the form and/or mention where a member can go to access the form:

BCBSM website:

<https://www.bcbsm.com/index/members/health-wellness.html>

OR

The Michigan Department of Health and Human Services has made the Nonopioid Directive Form available to the public on its website: [Michigan Nonopioid Directive Form](#)

IMPORTANT:

Patients should complete the form and sent to their primary care physician

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Regulation Update: Autism Spectrum Disorder Services Age Limit



Blue Cross is removing the **age limit** for autism spectrum disorder services.

Blue Cross **will follow recently updated state and federal requirements** regarding the removal of the age limits for autism spectrum disorder services for all underwritten and self-funded groups that provide autism coverage.

Blue Cross is **updating our medical policies and benefits to remove the age limit** on autism spectrum disorder services for our members.



Changes will be effective Jan. 1, 2022 and included in the 2023 plan certificates

What does this mean to you?

- Neither groups nor members will need to do anything to make this benefit change.
- Blue Cross will be publishing Sales and Agent communications, as well as customer newsletter articles and FAQs.

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Thank you

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