**Audience: Custom list of LG and National ASO; LG and NA broker/consultant**

**Email Header**

**Subject:** Changes to 2023 CAA RxDC reporting for self-funded groups

**Pre-Header:** You will be responsible for filing certain health plan data.

**Headline:** Important changes to 2023 CAA Prescription Drug Data Collection reporting for self-funded groups

In response to recent federal regulatory guidelines, we’re changing the submission process for Prescription Drug Data Collection (RxDC). Starting this year, Administrative Service Only (ASO) clients will be responsible for filing certain data.

The RxDC reporting provision of the Consolidated Appropriations Act (CAA) requires reporting on drug utilization and spending trends to be submitted to the U.S. Department of Health and Human Services. This reporting also includes reporting on premium and other information that we do not maintain.

For the initial filing of 2020/2021 data that was due December 27, 2022, we submitted the aggregated data by market segment on behalf of our ASO clients, for the benefits we administer and maintain. For this initial reporting year, this submission included aggregated D1 Premium and Life Years report for the benefits we administer and maintain.

**Important filing change**

*Beginning with the filing of 2022 data due June 1, 2023, ASO groups or their delegates will be responsible for the filing of the D1 Premium and Life Years report.* This will also require the submission of a corresponding Plan List by the ASO group.

Anthem will continue to complete the following reporting on behalf of ASO clients:

* P2 – Group Health Plan List
* D2 – Spending by Category Reporting (included in aggregate submission for the business we administer and maintain)
* Narrative Response applicable to the Anthem business

For clients that have integrated pharmacy coverage through CarelonRx (formerly known as IngenioRx), we will also submit the aggregated data in the D3 – D8 Pharmacy specific reports.

**Why are we making this change?**

There are several factors leading to this change.

In order to obtain all of the required information to file one consolidated D1 report, Anthem would have to collect, store, and report data from clients and third-party vendors. This raises concerns because this reporting includes financial and competitively sensitive data.

The Interim Final rule continues to evolve. Recent Centers for Medicare & Medicaid Services (CMS) guidance discourages the submission of multiple D1 reports for a group health plan. This change in direction more closely aligns with CMS guidance.

In many cases, our ASO clients use one or more third-parties or carveout vendors to support their business including, but not limited to, PBMs, Behavioral Health vendors, and Stop Loss carriers.

In addition, the D1 reporting includes other data elements such as the employer and employee premium contribution which we do not currently collect and maintain. The safe harbor regarding reporting of non-collected member and employer contributions on the D1 report expired after the December 27, 2022, reporting.

Your clients have access to all of their data required to submit a complete D1 report, as they are ultimately the source for their data. With the recent CMS guidance alluding to only one D1 report for each client, it makes the most sense for them to take ownership of the filing for the D1 report.

**Important next step**

If your clients have not already obtained the needed access for the RxDC reporting submission, they should begin to do so in preparation for the June 1, 2023, submission. You can find more information on the [CMS site regarding the access and forms needed for submission](https://www.cms.gov/CCIIO/Programs-and-Initiatives/Other-Insurance-Protections/Prescription-Drug-Data-Collection).

* The RxDC reporting instructions PDF will outline the data to be submitted in the D1 Premium and Life Years report along with the accompanying Plan Report.
* The site also has the template for the D1 Premium and Life Years file.
* The HIOS Portal User Manual PDF provides instructions on obtaining the needed access for filing.
* The HIOS Portal RxDC Quick Reference Guide PDF explains the file submission and upload process.

**In the 2022 reporting due June 1, 2023, we will still include ASO groups in the following:**

***For ASO clients that have integrated pharmacy with CarelonRx through Anthem***, we will include the client data that we administer and maintain in our aggregated submission for the reports shown below:

* Plan Lists (Individual and Student, Group Health Plan List, and FEHB Plan List) – as applicable
* Data Files (reporting of aggregated data based on state and market segment)
  + D2 - Spending by Category Reporting
  + D3 - Top 50 Most Frequent Brand Drugs Reporting
  + D4 - Top 50 Most Costly Drugs Reporting
  + D5 - Top 50 Drugs by Spending Increase Reporting
  + D6 - Rx Totals Reporting
  + D7 - Rx Rebates by Therapeutic Class Reporting
  + D8 - Rx Rebates for the Top 25 Drugs Reporting

***For ASO clients that have a vendor other than CarelonRx for pharmacy,*** Anthem will include the client data that we administer and maintain in your aggregated submission for the following reports:

* Plan Lists (Individual and Student, Group Health Plan List, and FEHB Plan List) – as applicable
* Data Files (reporting of aggregated data based on state and market segment)
* D2 - Spending by Category Reporting

We will also submit the applicable Narrative File with our aggregate reporting submission.

For more information, log in to EmployerAccess or visit the CAA/Transparency Resource Center or contact your account representative.