

Machine-Readable Files update with Anthem BCBS:

Compliance

	TIMING	DESCRIPTION	CARRIER STATUS
<i>No Surprises Act of the CAA, 2021</i>			
Plan coverage requirements/balance billing	01/01/22	Providers can no longer balance bill for emergency care, OON services in an in-network facility, air ambulance (if covered).	
Provider directory	Good faith interpretation until guidance issued	Must verify and update provider directory at least every 90 days. Update changes from a notifying provider within two business days.	
ID cards		Addition of deductible and OOP max on ID card, as well as a telephone number and website address for individuals to seek assistance.	
Continuity of care		If treating provider has a network status change, individual can continue receiving care at an in-network rate for 90 days.	
Advanced EOBs	Delayed until guidance issued	Provide an EOB to members to understand their cost prior to appointment.	
Surprise billing notice	01/01/22	A surprise billing notice should be posted on intranet page where medical coverage is addressed, explaining federal and applicable state surprise billing protections	Model notice provided
<i>Transparency in coverage final rule</i>			
Cost reporting	12/27/22; each June/Dec. after	Plans must report certain cost information, including certain prescription drug data.	DELAYED
Disclosure on public website and three machine-readable files	07/01/22 Rx delayed	Disclose in-network negotiated rates and billed charges and allowed amounts paid for OON providers.	DELAYED
Price comparison tool	01/01/23	Web-based, self-service tool/telephonic capability for members to compare pricing of 500 shoppable services.	DELAYED
Expanded self-service tool	01/01/24	Web-based, self-service tool/telephonic capability for members to compare pricing of all services.	DELAYED
<i>Mental health parity</i>			
Non-quantitative treatment limits	In effect	Plans are required to provide non-quantitative treatment limits (NQTL) analysis, comparing design, and application of medical/surgical benefits vs. MH/SA.	Self-funded customers are responsible for determining plan compliance

Lockton received further guidance on how Anthem BCBS will be administering the Machine-readable files requirement. Below are some FAQ's and Anthem's responses that were updated April 2022 (gray highlight indicates updates):

What is a machine-readable file?

A machine-readable file is defined 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. The final rules require each machine-readable file to use a non-proprietary, open format. The machine-readable files for the data we administer and maintain will be made accessible through anthem.com. Employers can link to those files; but due to the size of the files, we will not be providing the data directly to our clients for them to put on their websites. Anthem will only be publishing the data it maintains, so if a plan uses a third-party vendor, such as a PBM, then the group should work with that vendor to determine whether it is providing a similar solution.

How often will the machine-readable files be updated?

The files will be updated monthly.

Will you create these files and/or the website internally or utilize a subcontractor? If you are using a subcontractor, will you offshore?

We will create these files internally.

Will you only provide your data, or will your platform allow for merging other vendor's data (e.g., PBM, specialty network, etc.)?

We will only provide the data we administer and maintain.

Will the publicly available files be accessed through the current participant portal or be located in a new portal? Will you provide the files to plan sponsors or can plan sponsors link to the files?

These files will be accessible through anthem.com on a publicly available website. Due to the size of the files, we will not provide the data directly to our clients. Plan sponsors may link to those files as desired.

How will you monitor and validate your processes to ensure the ongoing accuracy of the data in the files?

Quality Audit (QA) processes will be an integral part of our solution design for the monthly file postings.

Will you distinguish between retiree and active plans in creating these files?

We are still working on our design for situations in which groups have multiple plans/products, keeping in alignment with the CMS guidance.

When will your platform be ready to launch?

We are targeting a July 2022 launch as defined in the August 2021 FAQ from the Tri-Agencies.

How will client-specific machine readable files be accessed on anthem.com?

Prior to file publication, we will communicate to clients how they can identify and access their data within the files.

Will employers be able to obtain test data and/or test files from Anthem prior to July 1, 2022?

No, we are not planning any external testing. Testing will be conducted internally by Anthem. Quality Assurance processes will be an integral part of our solution design. Prior to file publication, we will communicate to clients how to identify and access their data within the files.

Please describe how your organization will respond to questions regarding any missing values such as NPI, procedure codes, etc.

Those processes have been determined as a part of our design process.

Will you provide the plan with any of the three machine-readable files on a monthly basis including in-network rates, out-of-network allowed amounts, and prescription drug negotiated rates (for drugs dispensed under the medical plan)?

No, due to their size, the machine-readable files will only be made available on anthem.com.