# Broker News

For brokers and producers only

CareFirst

Date: January 2, 2024

**Markets: Commercial Markets, excluding MA, EGWP, FEP**

## Consolidated Appropriations Act (CAA) and Transparency in Coverage (TiC) Implementations—Important 2023 End of Year Updates

### CAA: Gag Clause Prohibition Compliance Attestation (GCPCA)

CareFirst successfully completed our initial attestation of compliance on December 18, 2023.

Our attestation included reporting on behalf of all fully insured business that was active for any period between December 27, 2020, and December 31, 2023. Please refer to the Broker News from August 10, 2023, for more information.

### CAA: 2024 Section 204 Prescription Drug Data Collection (RxDC) Reporting

Please read below about CareFirst's strategy in preparation for the June 1, 2024, submission deadline for Prescription Drug Data Collection (RxDC) reporting of 2023 reference year data.

It is our intent to submit all RxDC files (P2, D1-D8) as applicable to the lines of business we own, for both fully insured and self-insured clients. Under the previous set of RxDC reporting instructions (*released March 27, 2023*) for the 2022 reference year, this requires us to collect certain information from each employer group that CareFirst serviced for any portion of 2023. Both the fully insured and self-insured markets require additional data elements, with certain nuanced complexities in the self-insured market.

CareFirst teams may be conducting outreach to assist in collecting this data; we will provide more details in future communications. Please note that our plans are subject to change based on updates to guidance when CMS releases reporting instructions for the 2023 reference year. We will communicate any changes as quickly as possible.

### TiC: Cost Tool Expansion for January 1, 2024

Effective January 1, 2024, CareFirst has expanded the functionalities implemented at the beginning of 2023 for our cost estimator tools (for CareFirst and CFA) to include all available "shoppable" services by billing code. These tools are designed to reflect a member's coverage and current accumulators as applicable.

Cost estimates of all shoppable services are based on machine-readable files containing in-network data and allowable amount data submitted to Blue Cross Blue Shield Association (BCBSA).

### TiC: Prescription Drug Machine-Readable Files (MRF)

On September 27, 2023, the Departments of Labor, Health and Human Services, and the Treasury (the Departments) released *FAQs about Affordable Care Act Implementation Part 61*, where the Departments changed their position on the deferred enforcement of the Prescription Drug Machine-Readable File requirement.

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The publication of this guidance is a first step in moving towards enforcement, as the FAQs also stated that the Departments will develop technical requirements and an implementation timeline in future guidance. CareFirst and CVS Caremark are monitoring for updates, and we will provide more information as it becomes available.

### For more information

If you have any questions, please contact your CareFirst Account Consultant.