

Key Operational Updates Regarding Machine-Readable Files

As we previously communicated, we have been actively preparing to support our clients in meeting the Transparency in Coverage final rule requirements.

Under the Final Rule, certain plans and issuers must make machine-readable files available to the public for use by consumers, researchers, employers and others. Grandfathered Health Plans, account-based group health Plans and short-term limited duration Plans are not required to comply.

- The In-Network Machine-Readable File should include negotiated rates for all covered items and services between the plan or issuer and the in-network providers.
- The Out-of-Network Allowed Amounts Machine-Readable File should contain historical payments to and billed charges from out-of-network providers.

For plan years beginning January 1, 2022 through July 1, 2022, enforcement will begin in July 2022. For plan years beginning after July 1, 2022, plans and issuers should post the machine-readable files in the month in which the plan year begins.

To comply with the final rule you can choose to download your Machine Readable Files as they are available the first week of every month beginning on July 1st and post them directly to your website or **you may choose to include the link below on your website.**

We are working closely with networks partners and vendors to secure Machine-Readable Files. Many of our network partners have shared challenges in generating Machine-Readable Files given changing schema requirements and large files sizes in some cases resulting in delivery delays. Many partners are still expecting to have files available on July 1st and we will be closely monitoring network file delivery to ensure your client MRF link supports access to files as soon as they become available. In-Network File availability is dependent on the network.

You can access your Machine-Readable Files here: <https://caa.Imagine360.com/DELAWARE%20COUNTY%20GOVERNMENT/index.html>

- MRF files will not be available through the client specific link until July 1st or after depending on network partner file delivery
- Imagine360 will post updated files monthly
- MRF files will be made available free of charge for the remainder of 2022

Imagine360 remains committed to helping our valued partners support health plan compliance with the changing regulatory requirements. As always, we appreciate the opportunity to collaborate with you and we are happy to address any questions you may have. If you would like to discuss this in more detail, please let me know.