

What is the regulation?

Plans and issuers must make public two* machine-readable files that display the following:

- All applicable in-network rates (including negotiated rates, underlying fee schedules, or derived amounts) for covered items and services
- Billed charges and allowed amounts for covered items and services provided by out-of-network providers



*One additional file containing negotiated rates and historical net prices for prescription drugs furnished by in-network providers will be posted at a later time. Enforcement of this requirement has been delayed to allow the Federal Government additional time to provide further guidance.

What is Blue Cross doing to implement?

Blue Cross will make publicly available: monthly in-network medical and out of network medical files in .JSON format on [BCBSM.com](https://www.bcbsm.com).

Self-funded customers: A link to the applicable Blue Cross data will be made accessible to self-funded groups and/or TPAs appointed by self-funded groups to retrieve through Group Portal. The files themselves will be hosted by a Blue Cross vendor. Self-funded groups are responsible for posting the URL where the public can access it.

If Blue Cross does not administer a particular benefit for a self-funded group, data related to that benefit will not be included in the Machine-readable files produced by Blue Cross. Therefore, self-funded groups with these carve-outs will need to contact the entity who administers the carve out to obtain and post this additional data.

Self-Funded Check List

1. Does your group or TPA have access to Blue Cross Group Portal?
 - If no**, please work with your Account Manager to register, as it is required to collect our data.
2. Does your group/plan use Blue Cross to administer **all** your benefits?
 - If yes**, Blue Cross will provide all necessary data through group portal. Your group/plan will be responsible to copy the group specific URL and post on their preferred public site.
 - If no**, go to question 2
3. Does your group/plan have any medical, DME (Durable Medical Equipment), behavioral health, medical drugs, vision and/or other unique carve outs from Blue Cross?
 - If yes**, your group/plan will need to additionally collect data from those vendors and incorporate on your preferred public site.

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The information in this document is based on preliminary review of the national health care reform legislation and is not intended to impart legal advice. The federal government continues to issue guidance on how the provisions of national health reform should be interpreted and applied. The impact of these reforms on individual situations may vary. This overview is intended as an educational tool only and does not replace a more rigorous review of the law's applicability to individual circumstances and attendant legal counsel and should not be relied upon as legal or compliance advice. As required by US Treasury Regulations, we also inform you that any tax information contained in this communication is not intended to be used and cannot be used by any taxpayer to avoid penalties under the Internal Revenue Code

Where can I find more information about this mandate?

The Departments of the Treasury, Labor, and Health and Human Services (the Departments) have issued the Transparency in Coverage final rules (85 FR 72158) on November 12, 2020. The final rules require non-grandfathered group health plans and health insurance issuers in the individual and group markets (plans and issuers) to disclose certain pricing information. Under the final rules a plan or issuer must disclose in-network negotiated rates and billed and out-of-network allowed through two machine-readable files (MRF) posted on an internet website.

Link to regulation: www.cms.gov/healthplan-price-transparency/plans-and-issuers

Link to CMS technical requirements: github.com/CMSgov/price-transparency-guide

How will Blue Cross Blue Shield of Michigan comply with final transparency rules?

For fully insured business, Blue Cross will post a link to Blue Cross's MRFs on BCBSM.com. For self-funded groups, a link to a URL site with the group's MRFs will be available on the group portal. Groups should copy that link and add it to their own public website. The URL will not change and the MRFs will be managed and updated monthly by Blue Cross's vendor. Please note: *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.*

Who will have access to the machine-readable files?

The files must be available to the public as required by the regulation.

How often will the files be updated?

The files must be updated monthly.

How many months need to be made available at any point in time?

The most current files need to be available on your public website. Blue Cross recommends seeking legal counsel for advice on retention of historical files. Blue Cross will not be housing or storing historical files for self-funded groups.

What lines of business should be included under Machine Readable Fields?

All commercial lines of business (PPO & HMO), Medical, DME, non-stand alone dental and vision.

The three files that need to be made available are: in-network provider negotiated rates, historical out-of-network allowed amounts, and drug pricing information. Does drug pricing information pertain to part D prescription drugs and Part B drugs? How far back is his historical?

Enforcement of the drug pricing file requirements has been delayed to allow the Federal Government additional time to provide further guidance.

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Payer Transparency: Machine Readable Files

Steps to register groups for Group Portal



Nonprofit corporations and independent licensees of the Blue Cross and Blue Shield Association

Quick Reference Guide

BCBSM Employer Secured Services

Registration & User Administration

1. Registration

For assistance registering, contact our Blue Cross Blue Shield of Michigan Web Support Help Desk at 877-258-3932

The company's **Principal Administrator** must complete the following steps to register for access to Blue Cross Blue Shield of Michigan's *Employer Secured Services*

1. Go to bcbsm.com
2. Click **Login** to display log in options
3. Select **Employer**
4. Click **Register Now**
5. Click **Begin**
6. Review the Principal Administrator Agreement (To print a copy, click **Printable version**)
7. Select **I Agree**, click **Continue**
8. Select one of the following:
 - Group
 - Association/Chamber
 - Third Party Administrator
 Click **Continue**
9. Complete one of the following administrator registrations:

If you are ...	Then...
The Principal Administrator for a Group	1. Key information in the following fields as required: <ul style="list-style-type: none"> - BCBSM Group Number or BCN Facets Number - First Name - Last Name - PIN 2. Click Continue 3. Proceed to Step 10
An Association/Chamber Principal Administrator	1. Key information in the following fields as required: <ul style="list-style-type: none"> - Sponsor ID - First Name - Last Name - PIN 2. Click Continue 3. Proceed to Step 10
A Third Party Administrator	1. Key information in the following fields as required: <ul style="list-style-type: none"> - Company Name - Address - City - State - Zip Code 2. Click Continue 3. Proceed to Step 10

Note: First and Last Name fields **must** be entered to exactly match BCBSM's records. To verify your information, contact 877-722-6030 for assistance

10. Confirm Company Profile information, click **Continue**
11. Key User Profile information, click **Continue**

i The e-mail address you enter will receive all BCBSM Employer Secured Services related communications. This includes registration approval and changes to your profile or access.

12. Create your User Name and Password, click **Continue**
13. Select 2 security questions from the drop-down menu and key your answers in the corresponding field, click **Continue**
14. Verify all information is correct, click **Continue**

Note: If changes are needed to information you entered, click **Previous** to navigate back to the appropriate screen. Complete your changes, click **Continue** to return to Final Confirmation page

What happens after I register?

- You will receive an email notification approving your registration for BCBSM Employer Secured Services
- Go to bcbsm.com and log in to Employer Secured Services
- Invite new user(s)
- Approve invited user(s) registration
- Assign user(s) group code access
- Grant access (services) to user(s)
- Add Principal Administrator role to at least one user to share or delegate administrative responsibilities

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Quick Reference Guide

BCBSM Employer Secured Services

Registration & User Administration

2. Log In

1. Go to bcbsm.com
2. Click **Login** to display log in options
3. Select **Employer**
4. Key Username and Password
5. Click **Login**

Result: You have successfully logged in to *BCBSM Employer Secured Services*

3. Invite User(s)

1. Log in to *Employer Secured Services*
2. Select **Portal Access**
3. Click **View or Change Profile**
4. Select **Invite User**
5. Key the e-mail address for each person you wish to invite (separate each e-mail address using a comma)
6. Click **Ok**

What happens next?

- An e-mail registration request is sent to invited user(s)
- Upon completion, you will receive email notification to approve the registration, assign group codes and grant access to applicable tools for that user

4. Approve User(s)

1. Log in to *Employer Secured Services*
2. Select **Portal Access**
3. Click **APPROVEREGISTRATION**
4. Click **Approve**
5. Click **Ok**

Result: You have successfully approved an invited user

What happens next?

- Group codes must be added to new user(s)
- Access to tools and applications must be granted to new user(s)

5. Adding Group Codes

1. Log in to *Employer Secured Services*
2. Select **Group Code Access**
3. Click **All Users**
4. Select user
5. Click **Add Access**
6. To add:
 - All group codes
 - Under Automatic Updates, Select **Turn On**
 - For select group codes
 - Select desired group code(s)
 - Click **Add Access**

Result: You have successfully added group codes to a user

6. Adding Access (Services)

1. Log in to *Employer Secured Services*
2. Select **User Administration**
3. Click **Manage Users**
4. Key user's information in Search field
5. Select desired *search by* option from drop-down
6. Click **Search**
7. Select box next to desired user's name
8. Click **Change**
9. Select or key search criteria for desired service
10. Click **Search**
11. Select service(s)
12. Click **Ok**
13. Click **Submit Now**

Result: You have successfully added services to a user

7. Assign Principal Administrator Role

1. Log in to *Employer Secured Services*
2. Select **User Administration**
3. Click **Manage Users**
4. Key user's information in Search field
5. Select *search by* option from drop-down
6. Click **Search**
7. Select box next to desired user's name
8. Click **Change**
9. Click **Company Information**
10. Select box **Principal Admin**
11. Click **Submit Now**

Result: You have successfully assigned a user as Principal Administrator

Next Steps?

- Manage your users and enjoy the helpful tools and resources available to you in BCBSM's Employer Secured Services
- For information and support online, click **Help** (located at the bottom of each page)
- You can also contact the BCBSM Web Support Help Desk at 877-258-3932

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