



This is a reminder, under the Transparency in Coverage Rule (TICR), issued in 2020 by the U.S. Department of Health & Human Services, U.S. Department of Labor, and U.S. Department of the Treasury, **beginning 7/1/2022**, health plans (which includes clients who sponsor employee benefit plans) and health insurance issuers must publish two separate Machine-Readable Files (MRFs).

BBA is planning on being compliant with this provision of the TICR law. In preparation of the 7/1/22 date, BBA is providing you with the below MRF FAQ.

FREQUENTLY ASKED QUESTIONS

What is a machine-readable file?

A machine-readable file (MRF) 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."

What is required through this ruling?

The final ruling requires each machine-readable file to use a non-proprietary, open format. All machine-readable files for the data we administer and maintain will be made accessible through our website located on the Employer page <https://www.bluebenefitma.com/employers/machine-readable-file-links>. Employers should copy this link and post it to their public website to satisfy the ruling, and ensure they are in compliance.

Who will be creating and maintaining these files?

The BCBS Association and BCBSMA will be creating and maintaining these files and links.

How often will the machine-readable files be updated? Will you provide the plan or client with any machine readable files?

The files will be updated monthly. No, due to their size, the machine-readable files will only be made available on our website <https://www.bluebenefitma.com/employers/machine-readable-file-links>.

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.

When will your platform be ready to launch?

We are targeting a July 2022 launch to meet the federal compliance date. Links will not be posted prior to 7/1/2022.

Where will the publicly available files be accessed or located?

These files will be accessible starting 7/1/2022 through our publicly available website <https://www.bluebenefitma.com/employers/machine-readable-file-links>. Prior to 7/1/2022, these links will not be available on this page.

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

No, we are not planning any external testing. Testing will be conducted internally by BBA and BCBSMA. 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.