Employer/Producer FAQs: Transparency in Coverage (TIC)
FOR COMMERCIAL PLANS ONLY

The Transparency in Coverage (TIC) Final Rule, issued on November 12, 2020, sets forth requirements for group health plans and health insurance issuers to produce machine readable files (MRFs) disclosing in-network negotiated rates and historical out-of-network allowed amounts by July 1, 2022. In addition, plans and issuers must disclose cost sharing information, including an estimate of an individual's cost-sharing liability, for covered items or services furnished by a particular provider beginning January 1, 2023.

Questions	Answers
1. **Will UPMC Health Plan be compliant with the [Transparency in Coverage Final Rule](#)?**	UPMC Health Plan will make machine readable files (MRFs), including in-network rates and out-of-network allowed amounts, available online for July 1, 2022 in accordance with the final rule and updated timelines issued by the Departments of Labor, Treasury, and Health and Human Services. UPMC Health Plan will continue to monitor regulatory and sub-regulatory guidance to determine any further obligations applicable to MRFs related to prescription drugs. UPMC Health Plan will make the MRFs available on a secure public website via HTTPS in the CMS v1.0 schema. The MRFs will be available to the public without restrictions that would impede reuse of the data. There will be no charge as well as no requirement for user account, password or other credentials, or any personal identifying information.
2. **How many files will UPMC Health Plan be posting?**	UPMC Health Plan will post a Table of Contents file compliant with CMS Schema 1.0 that contains plan information and a corresponding fully qualified domain name where the in-network data and out-of-network allowed amount data can be downloaded. Requirements related to providing drug pricing information have been delayed. Accordingly, pharmacy rate files will not be included until indicated by updated guidance.
3. **What is an MRF? In what format will the data be posted?**	An MRF is a Machine Readable File. CMS has developed a required schema, v1.0, which has JSON and XML options for the In-Network rates and out-of-network allowed amounts files. UPMC Health Plan MRFs will be in the JSON schema. Click here for more information on CMS schemas.
4. **Do UPMC Health Plan clients need to specifically request or trigger the creation of the Transparency files for July 1, 2022 or the Shoppable Services for January 1, 2023?**	UPMC Health Plan clients, both Fully Insured and ASO, do not need to take any action for UPMC Health Plan to create and post compliant transparency MRFs or the 500 shoppable services with web based and telephonic access.
5. **Should employers include a link to the MRFs on their intranet site or within employee benefit information?**	UPMC Health Plan does not recommend inclusion of MRF links in employee/UPMC Health Plan member materials as, per CMS, "This pricing information can be used by third parties, such as researchers and app developers to help consumers better understand the costs associated with their health care." In addition, compliant MRFs have sizes and formats that are not consumer-friendly or accessible. UPMC Health Plan encourages promotion and use of cost estimation tools and is committed to helping members access the best and most affordable care. See Question 8 for additional information.

6.	**Where will the files be hosted? Will it be compliant?**	UPMC Health Plan will post our 7/1 and subsequent monthly Table of Contents files at https://www.upmchealthplan.com/transparency-in-coverage/mrf/ See Question 2 for additional information. UPMC Health Plan will make the MRFs available on a secure public website via HTTPS in the CMS v1.0 schema. The MRFs will be available to the public without restrictions that would impede reuse of the data. There will be no charge as well as no requirement for user account, password, or other credentials, or any personal identifying information.
7.	**How often will the files be updated?**	UPMC will update and post files monthly as required by the TIC rule.
8.	**Can our employees obtain cost estimates today?**	Yes. UPMC Health Plan has offered telephonic price quotations as well as a member-facing tool for cost estimation for shoppable services using a third-party technology for several years. This tool establishes a strong baseline for implementation of the required consumer-facing functionality. UPMC Health Plan is currently engaged in making necessary updates to ensure that the tool meets or exceeds the detailed transparency requirements for 1/1/2023 and 1/1/2024. UPMC Health Plan members can access a cost estimator tool via the Member Portal, *My*Health Online (MHOL). To access the tool: - From the MHOL homepage, click **Estimate and Explore Treatment Options** in the center column. - Click **Go to Estimator.** - In the disclaimer pop-up window, click **Accept**. See our Medical Cost Estimator brochure for additional information: Cost estimates are also available by calling Member Services.
9.	**What will be changing in terms of cost estimates due to the TIC requirements?**	The TIC Rules require that 500 specific shoppable services be available via online and telephonic channels and receivable by mail upon request. As such, the process and access required by the TIC Rule will not create change. However the specific input data and available estimates will evolve to meet the January 1, 2023 and January 1, 2024 requirements. UPMC Health Plan cost estimates currently incorporate member deductible and OOP progress and will continue to do so in compliance with the 2023 and 2024 shopping tool requirements.
10.	**Who are the files for?**	CMS states "This pricing information can be used by third parties, such as researchers and app developers to help consumers better understand the costs associated with their health care." Additionally, the CMS schemas are intended as MRFs and targeted for machine ingestion rather than consumer download.
11.	**How large are the files?**	The file sizes will vary based on network compositions, out-of-network claim volumes etc. However, the CMS schema is intended to support extremely large data sets targeted for machine ingestion.
12.	**Will UPMC Health Plan be archiving the MRFs?**	Yes, UPMC Health Plan will be archiving MRFs for 10 years.
13.	**Is a sample of the MRFs available?**	Yes, CMS has provided samples to support the Schema v1.0.