

Employer/Producer FAQs: Consolidated Appropriations Act (CAA) Section 204

FOR COMMERCIAL PLANS ONLY – Updated February 2024 for June 2024 Submission

Section 204 of the Consolidated Appropriations Act (CAA) of 2021 and its implementing regulations require health insurance issuers and group health plans to report certain information related to the cost of prescription drugs and health care spending to the Secretaries of the United States Departments of Labor and Health and Human Services.

Questions	Answers
1. What is Section 204 of the CAA?	Under Section 204 of the CAA, insurance companies and group health plans must submit information about prescription drugs and health care spending. This data submission is called the RxDC report. The Rx stands for prescription drug and the DC stands for data collection. More information is available here .
2. What information must insurance companies and employers submit?	The CAA requires insurance companies and group health plans to submit information about: <ul style="list-style-type: none"> • Spending on prescription drugs and health care services • Prescription drugs that account for the most spending • Drugs that are prescribed most frequently • Prescription drug rebates from drug manufacturers • Premiums and cost-sharing paid by members
3. Both insurers and group health plans are required to submit information under CAA Section 204. What information, if any, will UPMC Health Plan submit on behalf of its clients?	UPMC Health Plan will provide the required medical spend detail and information related to prescription drug costs to the extent UPMC Health Plan provides or administers such medical and/or prescription drug coverage on behalf of an employer group client. UPMC Health Plan will also collect certain required information from employer groups, including premium amounts paid by members and stop loss premium information, if applicable. UPMC Health Plan will not be collecting or reporting on information that is not currently in its possession or that is handled by a third-party vendor, insurer, or pharmacy benefit manager for a group.
4. Will UPMC Health Plan be reaching out to current clients for information needed for the June 1, 2024 submission to satisfy the requirements of CAA Section 204?	Yes, groups will need to affirmatively provide information to UPMC Health Plan (for example, the portion of premium amounts paid by employer versus member). We will reach out to groups with a data collection form and anticipate that the form will be distributed in March 2024. Employer groups do not need to trigger this request.
5. Will UPMC Health Plan be submitting files D1, D2, D3, D4, D5, D6, D7 and D8 for fully insured and self-funded groups on the group's behalf?	Yes, UPMC Health Plan will submit on fully insured and self-funded groups' behalf <i>to the extent UPMC Health Plan has the data in its possession as a result of the services it provides to the groups</i> . The submission will reflect data for any/all groups who were active at any point in the required submission year (regardless of whether the group has since terminated).
6. Will UPMC Health Plan be submitting files P1, P2 and P3 for fully insured and self-funded groups on the group's behalf?	Yes, UPMC Health Plan will submit on fully insured and self-funded groups' behalf <i>to the extent UPMC Health Plan has the data in its possession as a result of the services it provides to the groups</i> . The submission will reflect data for any/all groups who were active at any point in the required submission year (regardless of whether the group has since terminated).
7. Will there be a charge for the RxDC reporting?	There is no charge at this time.
8. Can employer groups receive a copy of the submission?	The RxDC reporting for a health plan issuer contains confidential and proprietary data. As such UPMC Health Plan will not share the completed RxDC templates.
9. How will employer groups know the report has been submitted?	UPMC Health Plan will make a submission confirmation statement available to groups and brokers once the reporting cycle has concluded.