

PRODUCER BLAST

This email is intended for producers with business in Delaware, New York, Pennsylvania, and West Virginia.

Consolidated Appropriations Act Section 204 Reporting Mandate: Prescription Drug Spending

Why am I receiving this?

Section 204 of the Consolidated Appropriations Act (CAA) of 2021 mandates that data be submitted to the Centers for Medicare & Medicaid Services (CMS) regarding prescription drug spending, healthcare spending, and enrollment for the 2025 calendar year. Highmark will submit the data on behalf of its fully insured and self-funded employer group clients in compliance with this year's deadline. We need your help to collect the necessary premium information for our mutual clients.

What do I need to know?

Deadline: The deadline to submit the required information is **April 17, 2026, at 11:59 PM EST**. Late submissions will not be accepted.

Data Required: We need specific premium data for both fully insured and self-insured (ASO) clients. The exact data required differs slightly between these groups (detailed below). This data will be aggregated and reported to CMS; individual client details will not be disclosed.

- **Fully Insured Clients:** Requires average monthly premiums paid by the employer and by members for calendar year 2025.
- **Self-Insured (ASO) Clients:** Requires more comprehensive data including total premium equivalents, ASO and TPA fees, stop-loss premiums, and average monthly premiums paid by the employer and members for calendar year 2025. ASO clients with carved-out pharmacy benefits must work with their Pharmacy Benefit Managers (PBMs) to submit the necessary pharmacy benefit data files directly to CMS. Highmark will not submit this data on their behalf.

Consequences of Non-Compliance: Failure to submit the required information by the deadline will result in Highmark's inability to include your clients' data in our submission to CMS. Self-insured clients will then be responsible for submitting the required data directly to CMS.

Survey Link: Direct your clients to complete the Highmark RxDC survey by clicking [here](#). If clients need assistance, we've created the [Section 204 Reporting - Highmark Client Tip Sheet 2026](#).

Note: *The survey link has been updated from our original email. We apologize for any confusion.*

What do I need to do?

To ensure a high response rate for the RxDC survey, Highmark will contact clients stressing the **April 17th deadline**. Producers may be asked provide support as necessary.

Questions?

Please reach out to your Client Manager.

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PRODUCER PULSE



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