



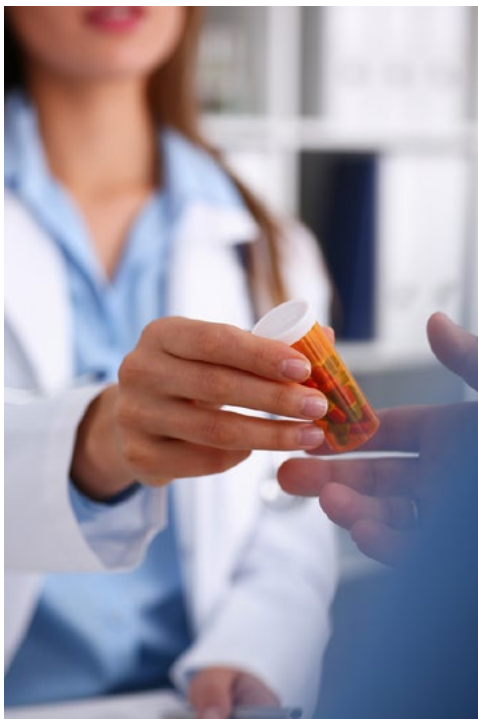
SIIA ENDEAVORS

SIIA REGULATORY REMINDER: PRESCRIPTION DRUG REPORTS DUE DECEMBER 27, 2022

Coordination is critical for self-insured reporting entities

The Self-Insurance of America, Inc. (SIIA) wants to ensure that members are aware of the upcoming reporting requirements mandated by the transparency provisions of the *Consolidated Appropriations Act of 2020 (CAA)*.

Specifically, the Prescription Drug Reports must be submitted to Centers for Medicare and Medicaid (CMS) by December 27, 2022.



The Reports are part of a larger effort to collect information on the amount of money health plans spend on medical services and prescription drugs through annual reports, which Congress has mandated for all group health plans, including self-insured plans. A more detailed summary of the reporting requirements and upcoming deadlines can be found [here](#).

In short, the Prescription Drug Reports must include information on the total spending on health claims related to a variety of medical services, as well as the total premiums paid under the plan, the total number of covered lives, and the cost-sharing paid by plan participants during the calendar year.

In addition to this plan-related information, the Prescription Drug Reports must include information on, among other things, the costliest

prescription drugs covered under the plan, the top 50 most frequently dispensed brand name drugs, and the top 50 prescription drugs with the greatest spending increase from year-to-year. As part of this, plans must also report the total amount of drugs covered under the plan, total rebates by class, and the top 25 greatest rebate amounts.

Along with the above information, plans must also include a “narrative file” explaining the size of the self-insured plan sponsor, the prescription drugs covered as medical benefits, the type and amount of drug rebates, the allocation methods for drug rebates, and how the drug rebates impact spending under the plan.

MULTIPLE REPORTING ENTITIES

Importantly for self-insured plans, the plan sponsor and TPA will have access to the plan-related information, while the plan sponsor’s PBM(s) will have access to the prescription drug-related information. Thus, multiple entities will be completing and submitting these Reports on behalf of a single self-insured plan.

This complexity means that coordination between the TPA(s), PBM(s), and/or third-party reporting entities will be critical in compiling, reporting, and submitting all of the plan-related and prescription drug-related information.

It will be imperative for self-insured plans, and their reporting entities, to prepare and coordinate ahead of the December 27, 2022 deadline.

SIIA will continue to provide you with any updates relating to the Prescription Drug Reports. For more information, or with additional questions, please contact Chris Condeluci at ccondeluci@siia.org or Ryan Work at rwork@siia.org. ■