

IMPORTANT CHANGES IN HEALTHCARE PROMOTING DRUG PRICE TRANSPARENCY

4 KEY DATES AND REQUIREMENTS

UPDATED: 03/15/2021

At Confidio, we are continuing to monitor the important changes in regulations regarding price transparency. The Federal Government will issue additional information regarding these changes in July 2021.

The three rules related to drug price transparency that were passed include the “Transparency in Coverage Rule” and “The No Surprises Act” and “Transparency”. The latter 2 are embedded in the “Consolidated Appropriations Act” (CAA).

The 3 key dates and requirements to be aware of for the “Transparency in Coverage Rule” are:

- **Effective 1/1/2022:** Machine Readable Files – These files will be used by researchers, employer groups and third-party application developers to assist in understanding current and past historical pricing information.
- **Effective 1/1/2023:** Member Price Comparison Tool for 500 services – Tool must be self-service browser based and provide real time out of pocket costs as well as prerequisites to coverage such as Prior Authorization and Step Therapy. The services for this first phase are still to be determined.
- **Effective 1/1/2024:** Member Price Comparison Tool for all services – This phase is related to enhancing the Member Price Comparison Tool requirement for 1/1/2023. It should include ALL items and services covered. These services are yet to be determined but will likely include drug pricing.

The key date and requirement to be aware of for the Consolidated Appropriations Act is:

- **Effective 1/1/2022:** Reporting on pharmacy benefits and drug costs including impact on premiums by rebates, fees and any remuneration paid by drug manufacturers.

We have sent Requests for Information out to our PBM partners to gather details regarding these changes and the services they may provide to clients to support compliance with the new regulations. We will keep you informed as we receive this information and any other guidance that may be helpful to you.

