

At Blue Cross and Blue Shield of Minnesota (Blue Cross), our top priority is to ensure the health and safety of our members.

We are committed to ongoing communications throughout this process as new information becomes necessary to share with our employer groups.

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**Machine-Readable Files (MRF)** – Effective July 1, 2022, Transparency in Coverage Rule (TCR) requires that Health plans make available to the public machine-readable files with: In-network (INN) rates negotiated with providers, Allowed amounts (historical payments) to out-of-network providers and their billed charges.

**1. Will your Plan build and manage the publicly accessible website with all required machine-readable files on behalf of clients?**

We plan to have a publicly accessible webpage on bluecrossmn.com about the machine-readable file mandate with links to government resources and a link to our MRF pricing files.

**2. Will your Plan incorporate external data (e.g., PBM, specialty network, etc.)?**

PBM pricing information is pending further regulatory guidance.

**3. How and where will the files be hosted?**

We will have a publicly accessible webpage on bluecrossmn.com about the machine-readable file mandate with links to government resources and a link to our MRF pricing files.

**4. How will stakeholders access the files?**

The files will be posted on July 1, 2022, on our website <https://www.bluecrossmn.com/mrf>

**5. What do employers need to do?**

INN pricing is provided by the issuer (BCBSMN) and PBM pricing information is pending further regulatory guidance.

**6. Will this be published on BCBSMN's website and not required to be published on employer's public website?**

BCBSMN will host the MRF files for our clients. Providers will need to follow their own mandates and they may need to reach out to their own legal counsel to determine what their requirements are as a provider.

**7. When does BCBSMN anticipate providing final details to our clients on strategy and any employer obligation?**

Blue Cross has provided updates throughout the implementation process and will continue to provide updates when available.

**8. Will BCBSMN be hosting the MRF files on behalf of fully insured clients?**

We will have a publicly accessible webpage on bluecrossmn.com about the machine-readable file mandate with links to government resources and a link to our MRF files.

**9. Will BCBSMN be providing a link for clients to post on their public facing website?**

An informational page will be available at <https://www.bluecrossmn.com/mrf> mid-June and will include links to files by July 1, 2022.

**10. Will you be notifying clients how to obtain the link once they are available?**

The files will be posted on July 1, 2022, on our website at <https://www.bluecrossmn.com/mrf>

**11. What is the deliverable BCBSMN is planning to provide to align with the transparency requirement?**

We will have a publicly accessible webpage on bluecrossmn.com about the machine-readable file mandate with links to government resources and a link to our MRF pricing files.

**12. How will the URL the client posts on their public website be accessed? (some carriers have a single URL (for all clients to the specific network fees) and other carriers indicating a URL that had the clients EIN in the URL.**

The files will be posted on July 1, 2022, on our website <https://www.bluecrossmn.com/mrf>

**13. Will all employers be required to obtain a link from BCBSMN to the files, to post on their own websites? It appears that if there is not a contract legally requiring BCBSMN to do this , the plan sponsors will still be liable.**

No, files will be available at <https://www.bluecrossmn.com/mrf> . Employers can post this link on their website.

**14. Will BCBSMN be hosting the files for self-insured clients? Will self-insured employers have to download the large files and host them on their own site? Will BCBSMN provide a link the client can post internally?**

BCBSMN will be hosting the files for fully, self-insured and Third-Party Administrators (TPAs) and we will provide a link that employers can post on their sites. Employers should seek their own legal guidance to determine their client obligations.

**15. Will all employers be required to obtain a link from BCBSMN to the files, to post on their own websites? It appears that if there is not a contract legally requiring BCBSMN to do this, the plan sponsors will still be liable.**

BCBSMN will be hosting the files for fully, self-insured and Third-Party Administrators (TPAs) and we will provide a link that employers can post on their sites. There is language in the service agreements at Article Three, Section 8 addressing regulatory compliance with laws, including the CAA. There is also indemnification language found at Article Five Section 2.

**16. Will this process differ between fully insured and self-insured clients?**

The process to make the files publicly available will be the same.

**17. Would BCBSMN allow groups to enter into a written agreement that go into more detail about the regulation or is BCBSMN taking the approach they will create the MRFs for all their clients and then it's up to the client from there?**

There is language in the service agreements at Article Three, Section 8 addressing regulatory compliance with laws, including the CAA. There is also indemnification language found at Article Five Section 2.

**18. How/where can I have this data translated/converted into readable information?**

We recommend companies work with a third-party resource and we are unable to recommend a specific vendor.

**19. Why are you posting pricing data publicly?**

Compliant with the federal rule, BCBSMN is mandated by federal requirements to make the MRFs publicly available.