TRANSPARENCY IN COVERAGE MACHINE-READABLE FILES (MRFS)

Client Reference Guide 5/1/22

Contents

This reference guide is being provided to and for the exclusive use of Cigna Medical clients to help them comply with the machine-readable file requirements under the Transparency in Coverage Rule, which is subject to enforcement as of 7/1/22. Clients should contact their Cigna representative to confirm which hosting option is relevant for them.

Together, all the way.®

Background on the Requirement

Under the Transparency in Coverage Rule, issued in 2020 by the US Departments of Health and Human Services, Labor, and the Treasury, enforced beginning 7/1/22, health plans and health insurers must publish two separate machine-readable files (MRFs) as follows:

› **In-Network:** Negotiated rates for all covered items and services between the plan or issuer and in-network providers.

› **Out-of-Network:** Allowed amount paid to, and billed charges from, out-of-network providers for all covered services within a 90-day period.

The rules require that plans (including clients who sponsor employee benefit plans) post these MRFs on their own public-facing website. However, the regulations allow for a third party to host files on their clients' behalf. In this case, the plan can choose to not host the file separately on its own website, but it must provide a link on its website to the location where the file is publicly available. The purpose of this requirement, similar to the public website requirement, is to ensure accessibility and transparency. Essentially, clients only need to post the link to their files being hosted by Cigna.

What Cigna is doing:

› Cigna will be producing and hosting client-specific MRFs to assist our clients in compliance. These files will be hosted by Cigna at no cost to you.*

› For Cigna clients who do not have a public website, Cigna is providing a website specifically for this purpose.

› For Cigna clients who have a client-specific network in place, Cigna is providing a custom website that will contain MRFs with the client's specific rates only.

› Cigna is providing instructions, including technical requirements, on how to access the links to their files both through **Cigna.com** and **CignaForEmployers.com**, our proprietary client portal. This is particularly relevant for clients who intend to host their own files or who are delegating hosting to another third party.

What clients need to do:

› Follow the instructions on the next two pages for the type of hosting option that applies to you as a client. Other than clients who have "opted out," clients do not need to download the files; rather, they should simply follow the instructions to access the links.

› Except for the rare exception where clients are hosting their own files or are delegating hosting to another third party, there is no need to download, or attempt to download, the files. These are large JSON files that can be over a terabyte in size and have significant system requirements for use. They are formatted to allow researchers, regulators and data aggregators to more easily access and analyze the data. Specific hardware and software capabilities are required to facilitate download and to avoid potential negative implications to your computer system.

› Cigna's covered employees and their dependents who need information about the cost of services should leverage the pricing tools on **myCigna.com** or contact Cigna's customer service team for information to meet their needs. The number can be found on the back of their Cigna card.

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* No new charges will apply on effective dates through the end of 2023 for standard delivery/hosting of machine readable files. Charges beyond that will be evaluated at a later date.

What Clients Need to Do: Standard Hosting Option

The majority of Cigna clients will fall under this option. This option means that Cigna hosts the MRFs and clients need only post a link to those files on their own public-facing website.

To meet regulatory requirements, Cigna recommends you take the following actions:

› On or before 7/1/22, copy the link below and post it to your public website. This is the link the general public can use to access the MRFs: **https://www.cigna.com/legal/compliance/machine-readable-files**.

  – The link will be active on 7/1/22, but you can post it on your website prior to 7/1/22.

  – You can determine on which page of your public website you would like to place the link.

  – Per the regulation, anyone in the United States should be able to find this link on your website without any requirement, such as a password, a fee or an age restriction.

› Along with the link, please include the following recommended overview verbiage:

  This link leads to the machine-readable files that are made available in response to the federal Transparency in Coverage Rule and include negotiated service rates and out-of-network allowed amounts between health plans and health care providers. The machine-readable files are formatted to allow researchers, regulators and application developers to more easily access and analyze data.

› Clients need only follow this process once to establish the link. Cigna will update the files each month, and this link will remain constant and always access the most up-to-date files.

What Clients Need to Do: Cigna-Provided Public Website Option

For clients who do not have a public-facing website and Cigna has provided one specifically for this purpose.

To meet regulatory requirements, Cigna recommends you take the following actions:

› Because you do not have a public website, Cigna has created one for you with the link to the MRFs. You do not need to take any additional steps. Your website will be **www.ticmrf.com/yourEIN**. In other words, **www.ticmrf.com/** with your employer identification number (EIN) after the slash.

  – For example, let's use an EIN of 99-1234567.

  – In this example, the client's website will be **www.ticmrf.com/99-1234567**.

› Upon request, you should provide this URL to the requestor to access your files.

› Cigna will update the files each month, and this website will always access the most up-to-date files.

What Clients Need to Do: Cigna Clients with Client-Specific Networks

For clients with client-specific networks, Cigna provides a custom public website that contains the MRFs with the client's specific rates only.

To meet regulatory requirements, Cigna recommends clients take the following actions:

› You will need to post the link to your public website.

› The name of your website will be **www.ticmrf.com/yourEIN**. In other words, **www.ticmrf.com/** with your employer identification number (EIN) after the slash.

  – For example, let's use an EIN of 99-1234567.

  – In this example, the client's website will be **www.ticmrf.com/99-1234567**.

› You can determine on which page of your public website you would like to place the link. Per the regulation, anyone in the United States should be able to find this link on your website without any requirement, such as a password, a fee or an age restriction.

❯ Along with the link, please include the following recommended overview verbiage:

This link leads to the machine-readable files that are made available in response to the federal Transparency in Coverage Rule and include negotiated service rates and out-of-network allowed amounts between health plans and health care providers. The machine-readable files are formatted to allow researchers, regulators and application developers to more easily access and analyze data.

❯ Clients need only follow this process <u>once</u> to establish the link. Cigna will update the files each month, and this link will remain constant and always access the most up-to-date files.

❯ The link will be active by 7/1/22 but can be posted on your public website prior to 7/1/22.

What Clients Need to Do: Cigna Clients Who "Opt Out"

For clients who intend to host their own files or delegate to another third party (i.e., they have opted out of Cigna's standard hosting service).

To meet regulatory requirements, Cigna recommends clients take the following actions:

The files are accessible on both **Cigna.com** and **CignaForEmployers.com**. (Use **CignaForEmployers.com** to identify only those files that are applicable to you.)

Finding your machine readable files:

❯ Log on to **www.cignaforemployers.com** – you will be authenticated.

  – If you do not have a **www.cignaforemployers.com** account, please contact your sales representative.

  – On the left side of the portal, click Materials & Resources to access the Machine-Readable File page as shown in *Figure 1* below.

❯ Each file will be displayed; these MRFs are specific to you. Because you or a third party are hosting your own files, you will need to download the file and edit them to reflect your company's specific identification information.

❯ Download your files. (Do not post the "Copy Download Link" on your public website as this does not meet the compliance requirements. Your files need to be edited with your specific plan information.)

❯ Edit the file(s) to reflect your plan information and EIN, and post the files on your public website or your third-party delegate's public website.

Figure 1

NOTE: Please do not post the actual links from the "Copy Download Link," only the text from the File Name column.

Optional Information Related to Direct Access to Files

OPTIONAL – In the event clients ever want to access their MRFs directly.

Please Note: As stated earlier, there is no need to download, or attempt to download, the files. These are large JSON files that can be over a terabyte in size and have significant system requirements for use. They are formatted to allow researchers, regulators and data aggregators to more easily access and analyze the data. Specific hardware and software capabilities are required to facilitate download and to avoid potential negative implications to your computer system.

Further, we recommend that file downloads be made only in conjunction with a planned use for the file, the coding, the IT team and your strategic purpose. These files cannot be opened and analyzed on a standard consumer-level desktop or laptop. A server-class machine running Linux is recommended to download and ingest the MRFs. Multiple processor cores and significant disk space are required to process the large, coded JSON files. Additional information regarding technical requirements can be found on **CignaForEmployers.com**; see call out in figure below.

❯ Log on to **www.cignaforemployers.com** – client will be authenticated.

   – If you do not have a **www.cignaforemployers.com** account, please contact your sales representative.

❯ On the left side of the portal, click Materials & Resources to access the Machine Readable File page as shown in the figure below.

❯ Each file will be displayed; these MRFs are specific to each client.

Machine-Readable File System Requirements and Recommendations

The system requirements identified below apply **only to self-funded (ASO) clients who may wish to host their own files or delegate hosting to a third party**.

File Type:

> Nested JSON, compressed with Gzip.

Hard Drive Space Required:

> Compressed files may be up to 650 gigabytes (GB); uncompressed files may be up to 1.5 terabytes (TB).

> To download and decompress a single file may require up to approximately 2.5 TB of free hard drive storage.

Download Time Estimates, Based on a Compressed 650 GB File:

BANDWIDTH	SECONDS	MINUTES	HOURS
5 megabit (MB)	123,978	2,066	34.5
10 MB	61,989	1,033	17.1
100 MB	6,199	103	1.7
1 gigabit (GB)	605	10	0.2
5 GB	120	2	0.0

RAM Recommendation:

> Cigna utilized 758 GB of RAM to compress the files.

> With this amount of RAM and the recommended processor (below), expect approximately one to two hours to decompress a single file.

CPU/Processor Recommendation:

> Cigna utilized a 96-core CPU to compress the files.

> With this amount of cores and the recommended RAM (above), expect approximately one to two hours to decompress a single file.

Compression Software:

> Compression software that can decompress Gzip (e.g., WinZip, 7-Zip, default compression libraries in Linux).

File Editor:

> A file editor that can open a 1.5 TB file (e.g., EmEditor).