

## FAQs

### As an Employer, where should I put my MRF's so I'm in compliance on July 1, 2022?

The link to access your MRF's must be placed on a public-facing website. This can be your main company website or a website your company has for the group health plan (less common). The link CANNOT be placed anywhere access needs to be granted. The two machine-readable files, in-network negotiated rates and historical out-of-network billed and allowed amounts, when appropriate, must be published by law. The third machine-readable file, negotiated rates and historic net prices for prescription drugs, has been put in delayed enforcement pending further rulemaking including format definition.

You may place access on any publicly accessible web page on your site. You may want to add some explanatory information for Employees or anyone else who views the page. It's important to note on the page that the MRF's will not help you and your members to shop. That language should lead them to more information on the "Powered by TALON" tools we provide to you including the MyMedicalShopper comparison shopping tool along with how to download it – if they haven't done so already.

This is an example for a notional employer called 'Eiger Nordwand' ...

**URL:** [https://eignordwand.com/machine\\_readable\\_files.html](https://eignordwand.com/machine_readable_files.html)

**Header:** Solutions, About Us, News & Events, Blog, Resources. Contact Sales, Contact Support, Login.

**Main Content:**

- Welcome to Eiger Nordwand's Machine Readable Files (MRF's). To access our MRF's, click [here](#).**
- A note to our Employees or anyone else unfamiliar with MRF's ...**
- The link above leads to Machine Readable Files that have become a requirement under recent legislation, which is intended to improve price transparency for consumers. While you could open and look at these, they won't make much sense to you. They're really intended for researchers, regulators, and other vendors so they can analyze data and create User facing applications.**
- We have used these files and have contracted on your behalf for a User-Friendly pricing tool. Please DO click << insert hyperlink that leads to a << TPA specific link >> to download the app, get instructions to download, or just screenshots and other instructions >>**
- Thanks for reading! Let's use this tool to make much better-informed decisions, save some money, and improve quality!**

**Annotations:**

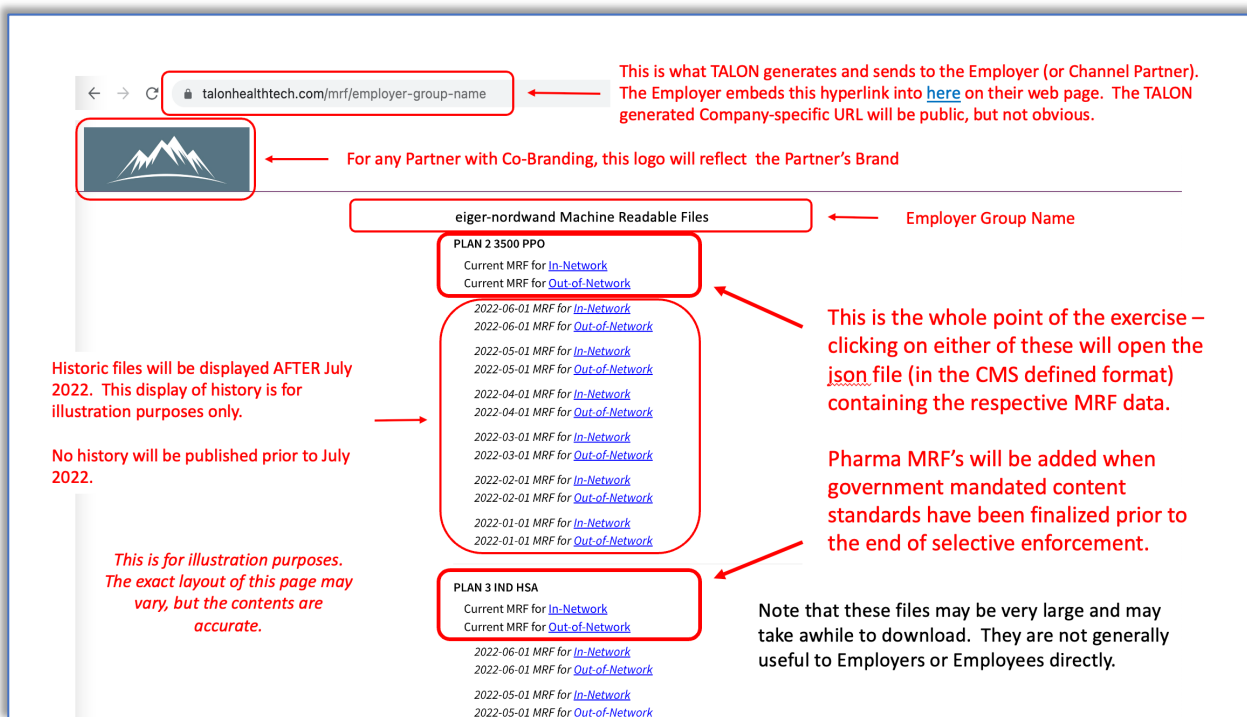
- This can be any existing or new page the Employer chooses.** (Points to the URL bar)
- This checks the box for July 1, 2022 compliance. The [here](#) hyperlink leads to the Employer-specific page at the URL provided by the Partner. It's the same URL as you see in address bar of the next illustration.** (Points to the welcome message)
- You may want to explain this page to casual viewers, and redirect Employees to where they can learn more about MyMedicalShopper and possibly other services from TALON.** (Points to the explanatory text)
- For example, this text may lead them to the same URL that leads a Member to create their TALON credentials.** (Points to the explanatory text)

**Footer:** This is for illustration purposes. The exact layout of this page is at the discretion of each Employer.

*Notional Example of what a new Employer web page for MRF's might look like.*

*Page content is in black. Notes for illustration are in red.*

The files will live on TALON maintained servers. When someone clicks on the ‘click [here](#)’ on an Employer-specific link, they are routed to a unique Employer-specific exclusive web page ...



*TALON landing page when someone clicks through from an Employer web page.  
Page content is in black. Notes for illustration are in red.*

### ***What if my company doesn't have a public-facing website?***

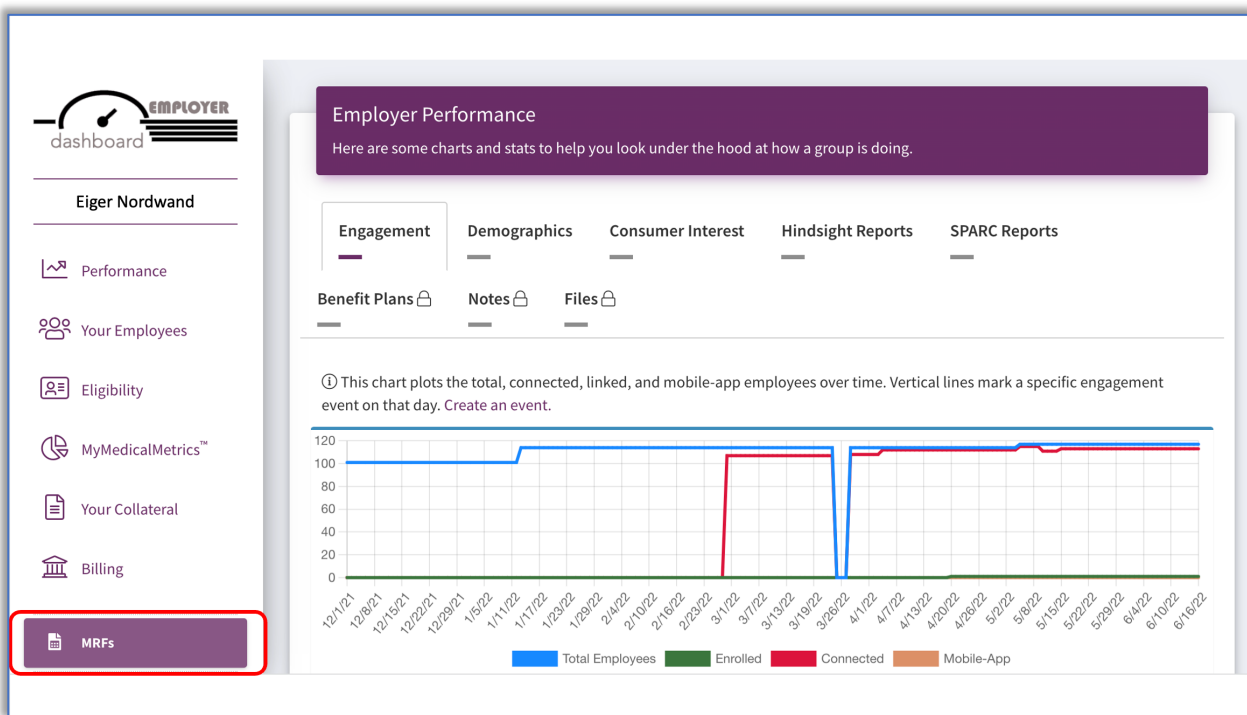
We believe the Transparency in Coverage Rule requires that Employers must have a publicly facing website, so you may need to create one. Please consult your own compliance officer if needed.

### ***Do I have to tell anyone once the MRF's are published?***

No. There is no requirement to tell your Employees, Members or anyone else that you've published your MRF's. If you're audited, you'll need to be able to navigate to them in the public domain.

### ***As an Employer System Administrator, can I see my MRF's from inside the TALON application?***

Yes. We've added a link to 'MRF's in the Left margin. That link will take you directly to the Employer-specific landing page (see above). Note that this alone does help achieve compliance, as the Employer Dashboard requires a UserID and Password to access.



*Existing Employer Dashboard with new 'MRF' link on the lower left navigation bar*

### ***How many months' worth of history will you maintain for each Employer?***

We currently plan on maintaining historic files indefinitely. There isn't clear guidance that we can find about how many months of history should be displayed on the Employer-specific site. We're currently considering 3-6 months.

----- End of communication to employer groups (plan sponsors) -----

### ***How does a new group we bring on find their MRF?***

TALON will generate an additional landing page, MRFs and an employer-specific exclusive URL for the new group that will be displayed in your Support Dashboard once we have the following:

- Group ID

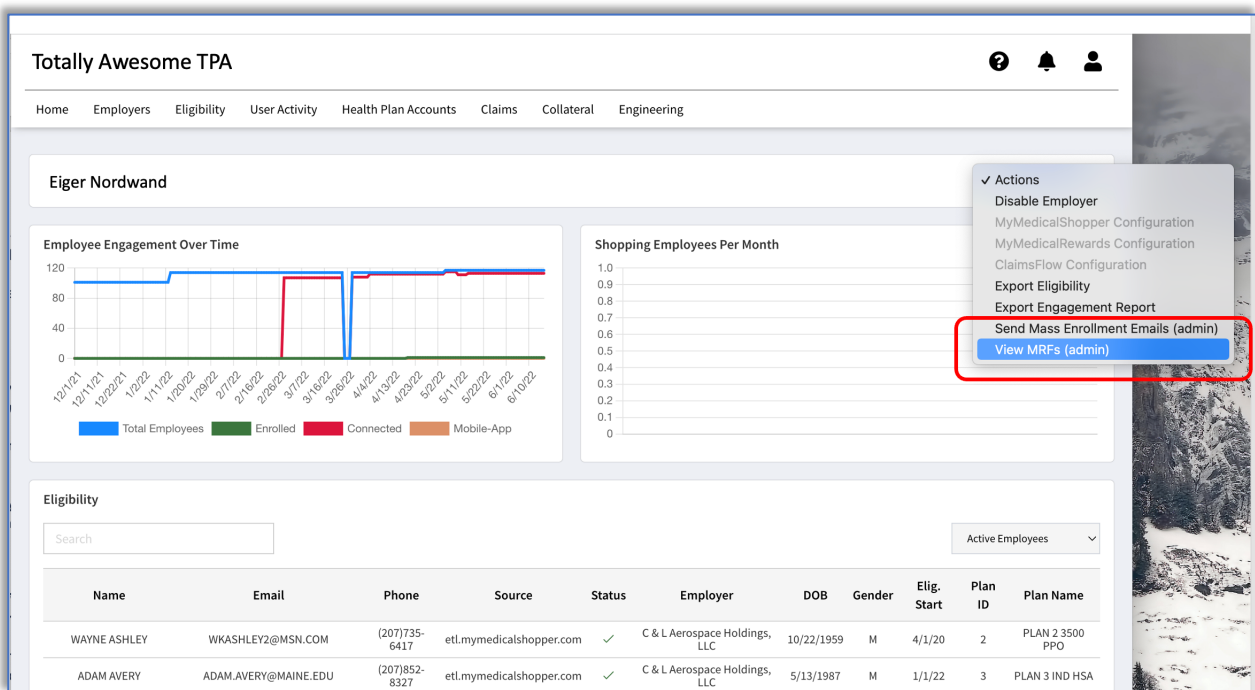
- Plan ID
- Plan Documents
- Networks (Tiered)
- Special Pricing Arrangements

You are used to providing this in your Book Of Business worksheet and will send over an updated version each time you add a new group (along with your Employer Group Service Order).

Once the new Group can see their Employer Dashboard, they can see the MRF link described above.

### ***As a TPA, how can I see my Employer Groups MRF's?***

We added a new 'View MRF's' option to the Actions menu under the upper right corner. That link will take you directly to the Employer-specific landing page (see above) for the Employer Group in focus. From there, you may copy the Employer-specific URL and share it with your Employer Group.



*Existing Support Dashboard with new 'View MRFs' link on the Actions bar*

***I'm still working on getting you information on special pricing arrangements/RBPs - will this delay you hosting the MRFs?***

Absolutely not! While we are in the realm of "good faith" (often referred to as "Safe Harbor") we can use both historical data and primary payor(s) to create the MRF. We will supplement these

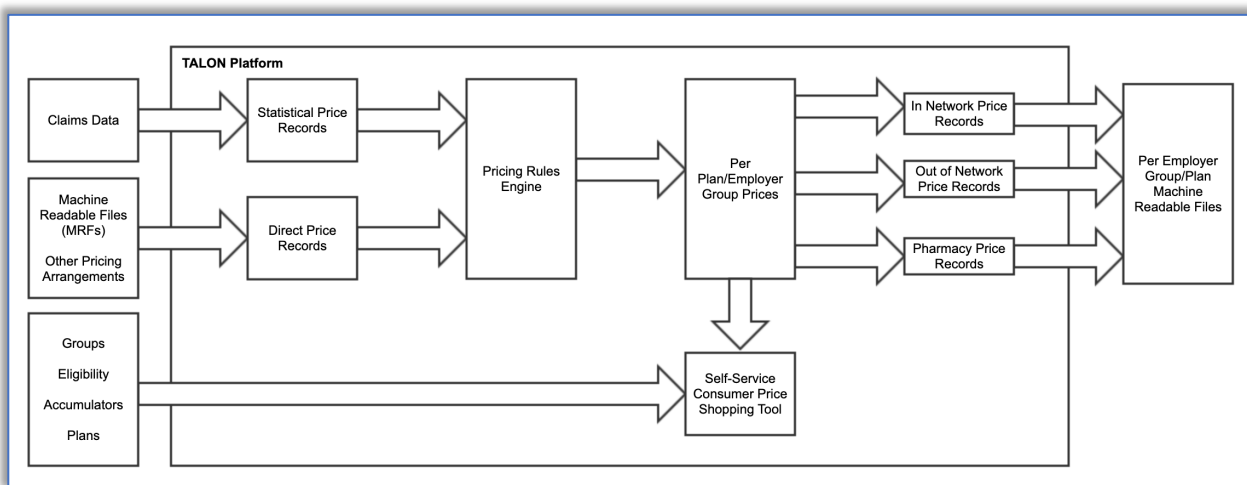
files with more data as you provide it to us. With this process, eventually the "good faith" clause will go away. We do need to mutually commit to the best practice of populating all pricing data from special arrangements, RBPs, etc. but for now, you'll remain in compliance.

***Do I have rich enough data sources to produce Employer and Plan specific MRF's that will keep us compliant after Safe Harbor?***

If you haven't confirmed with TALON that all feeds on the left side of the diagram below are fully functional, contact our Support Desk.

***How content rich will my MRFs be?***

They'll be as rich as the data that is available from your data feeds and your Carriers. We seek to receive consistent and persistent electronic updates on Plan Design, other pricing arrangements, and Carrier MRF's. If any of those sources are absent or outdated, your MRF's will reflect that. Many Carriers are waiting until the last moment to provide their negotiated rate data or MRF's. We will produce and update Plan-specific MRF's based on the data available to us at the time of periodic production.



*Data flow from source to MRF*

***Where can I find the reference sources for the Transparency in Coverage Rule?***

A quick overview by CMS for Plans and Issuers can be accessed [here](https://www.cms.gov/healthplan-price-transparency/plans-and-issuers).

<https://www.cms.gov/healthplan-price-transparency/plans-and-issuers>

The CMS Transparency in Coverage page can be accessed [here](https://www.cms.gov/healthplan-price-transparency).

<https://www.cms.gov/healthplan-price-transparency>

The CMS Transparency in Coverage Final Rule Fact Sheet (CMS-9915-F) can be accessed [here](#).

<https://www.cms.gov/newsroom/fact-sheets/transparency-coverage-final-rule-fact-sheet-cms-9915-f>

Transparency in Coverage in the Federal Register can be accessed [here](#).

<https://www.federalregister.gov/documents/2020/11/12/2020-24591/transparency-in-coverage>

The Department of Labor Employee Benefits Security Administration site on Transparency in Coverage can be accessed [here](#).

<https://www.dol.gov/agencies/ebsa/laws-and-regulations/laws/affordable-care-act/for-employers-and-advisers/transparency-in-coverage>

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