

For valued CareFirst partners only

Date: April 10, 2024

Markets: All Commercial Markets, including CFA and NCAS

CAA: RxDC – CY 2023 Data Collection from Clients – Due May 10th

As previously shared, CareFirst is preparing to submit the annual Prescription Drug and Health Care Spending (RxDC) Reports on behalf of all clients that were enrolled in our medical and/or pharmacy products for any portion of 2023. This mandated federal reporting is due June 1, 2024.

Please read this email and the applicable attachments carefully and in their entirety, as there is a substantial amount of information provided to try and proactively address any questions you may have.

Thank You for Your Patience

We appreciate your patience as we have worked diligently to develop an IT-supported solution to collect certain data for this annual report submission going forward.

Recent high-profile cybersecurity breaches have had devastating impacts to both consumers and businesses in the affected industries. These events underscore our responsibility to our clients to ensure that each new solution we develop has the necessary safeguards in place to protect any data that is shared with CareFirst.

With that in mind, we have had to delay the launch of our permanent solution until after the upcoming submission of data for the 2023 reference year and pivot to execute an interim solution to support this year's submission.

What to Expect

Client contacts will receive an email this week from the CareFirst RxDC Reporting Team with a unique hyperlink to one of our RxDC Surveys powered by Qualtrics – Fully Insured, Self-Funded, or CFA/NCAS. **All survey responses are due by Friday, May 10, 2024.**

The email will come from <DoNotReply.CareFirst.RxDC@carefirst.com> with a subject line that reads **"ACTION REQUIRED – 2023 RxDC Data Request Due May 10th"**. Content will include key information and a hyperlink to the applicable RxDC Instructional Guide for the 2023 reference year reporting with background information and details about the data we are requesting based on the CMS guidance released in February of this year to supplement the informational guidance included with each survey question.

Clients should review the applicable RxDC Instructional Guide(s) and collect the information requested before clicking the link to take the survey. Once a response is entered, they will not be able to go back and make any changes.

Clients that do not want CareFirst to submit the RxDC – D1 Premium and Life-Years file on their behalf should click the survey link to provide that response. Selecting the opt-out at the beginning of the survey will end the survey without the ability to go back and change the response.

Clients that opt out or do not provide all of the data requested by May 10th will be responsible for ensuring that their RxDC - D1 Premium and Life-Years information is submitted to CMS according to the requirements.

Please note that the information CareFirst is requesting in the survey does not depict the full scope of information required in the RxDC – D1 Premium and Life Years file. Clients responsible for their own submission can find instructions, materials, and information on how to contact CMS for assistance here on their RxDC webpage: [Prescription Drug Data Collection \(RxDC\) | CMS](#).

CareFirst RxDC Survey Timeline for Collection of 2023 Data

Initial Email	Week of April 8th – April 12th
1st Reminder	Monday, April 22nd
2nd Reminder	Wednesday, May 1st
Due Date	Friday, May 10th – No Exceptions

- After May 10th, clients that have not responded to the survey with the requested information will not be included in CareFirst’s submission of the RxDC – D1 Premium and Life-Years file.
- CareFirst will still submit all other RxDC files on behalf of the client for the benefits we administered for any portion of calendar year 2023.

Email Recipients

As shared in the [February 29th Partner News](#), our Account Teams recently went through an exercise to collect and validate email address information for the individual that should receive the survey for each client. The unique survey link is recipient-specific, meaning the contact can forward it if they would like someone else to provide the survey responses.

FlexLink and NetLease clients will not receive the email as CareFirst does not submit RxDC Reporting on their behalf.

If you requested to be the primary contact for multiple clients, you are going to receive a separate email for each client. The name of the client account (as it appears in the CareFirst systems) will be appended to the subject line of the email. It is important to ensure that the data you provide in a survey is the data for the specific account tied to that email and survey link.

Note: Certain client contacts for CFA clients with multiple plan sponsors will receive one email with a separate link for each plan sponsor. The links in those emails will be labelled with the specific plan sponsor name.

Emails returned as undeliverable will be addressed by the CareFirst RxDC Reporting Team in collaboration with the Account Teams. Someone will reach out to you for any assistance that might be needed to ensure that we fulfill our compliance obligation to make every effort to obtain the necessary data from all clients.

Email Content

All client contacts will receive the same email, apart from their client-specific information and the applicable RxDC Instructional Guide.

You can access a copy of the email messaging [here](#).

Data to Provide

All data provided should be specific to the portion of calendar year 2023 for which CareFirst administered their benefits. Clients whose Rx contracts with CareFirst for CVS Caremark ended prior to January 1, 2023, will be included on the RxDC – P2 Group Health Plan List in the CareFirst submission to support any applicable prior year data that is required in the files prepared by the PBM. These clients are not included in the email survey distribution, and the CMS guidance limits what information needs to be populated for those group health plans.

Please refer to the applicable CareFirst RxDC Instructional Guide(s) for details about each data element listed below. Details may vary by market segment.

Data Element	Fully Insured	Self-Funded	CFA/NCAS
States where the plan is offered	✓	✓	✓
Total Premium (or Premium Equivalent) Amounts Paid by Members	✓	✓	✓
Total Premium (or Premium Equivalent) Amounts Paid by Employers	✓	✓	✓
Stop Loss Issuer Name & EIN	N/A	<i>If not CareFirst</i>	<i>If not CareFirst</i>
PBM Name & EIN	<i>If not CareFirst's CVS Caremark</i>	<i>If not CareFirst's CVS Caremark</i>	<i>If not CareFirst's CVS Caremark</i>
Total Premium Equivalent Amount	N/A	✓	✓
Total Admin Fee Amount	N/A	✓	✓
Total Stop Loss Premium (Specific and Aggregate)	N/A	✓	✓

CareFirst RxDC Instructional Guides

The following guides will be hyperlinked in the applicable surveys:

- [Fully Insured RxDC Instructional Guide](#)
- [Self-Funded RxDC Instructional Guide](#)

Please note that the guide for self-funded clients is applicable to CFA and NCAS clients. While the title of the hyperlinked guide that is displayed in the email will say CFA/NCAS if applicable, the guide itself is identical.

CareFirst RxDC Survey Outlines

Below are outlines of the surveys to aid you in supporting your clients:

- [Fully Insured RxDC Survey Outline](#)
- [Self-Funded RxDC Survey Outline](#)
- [CFA/NCAS RxDC Survey Outline](#)

Information to Support Clients with File Submissions Separate from the CareFirst Submission

- CareFirst will aggregate data for all clients under the D2 Report Filing Entity, CareFirst, Inc., for each distinct aggregation state/market segment combination. This allows other submitting entities to aggregate a client's data at their choice of issuer-level, TPA-level, plan sponsor-level, or plan-level without violating the aggregation restriction that no longer has deferred enforcement.
- Below are the EINs for each entity to support whichever level of aggregation another submitting entity might use:

Legal Entity	EIN
CareFirst, Inc.	52-2069215
CareFirst Administrators	52-1187907
National Capital Administrative Services	52-1187907
CareFirst BlueChoice, Inc.	52-1358219
CareFirst of Maryland, Inc.	52-1385894
Group Hospitalization Medical Services, Inc.	53-0078070
CaremarkPCS Health, LLC (CVS)	75-2882129

For more information

If you have any questions, please contact your CareFirst Account Consultant.