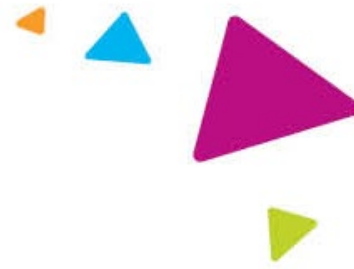


# Consolidated Appropriations Act (CAA) Section 204

**Mollie Bigelow,**  
Senior Project Manager, PBM Operations

**Magellan Rx**  
MANAGEMENT<sup>SM</sup>

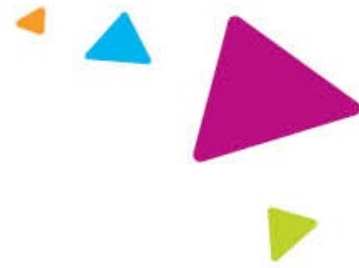
# What is CAA Section 204?



Title II (Transparency) of Division BB of the Consolidated Appropriations Act, 2021 (Pub. L. 116-260) (CAA), establishes new protections for consumers to promote transparency in health care costs and, particularly, prescription drug costs.

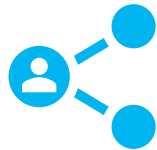
Section 204 of the Transparency Title authorizes the collection of prescription drug and health care spending data from group health plans and health insurance issuers on an annual basis.

# Submission of Files



## Magellan Rx Submission

Magellan Rx will submit files directly to CMS on behalf of our clients. Magellan Rx will send data for files P1-P3 and D3-D8. We will not submit D1 and D2 files reflecting premium and medical data. Your plan medical vendor should provide/submit the medical data.

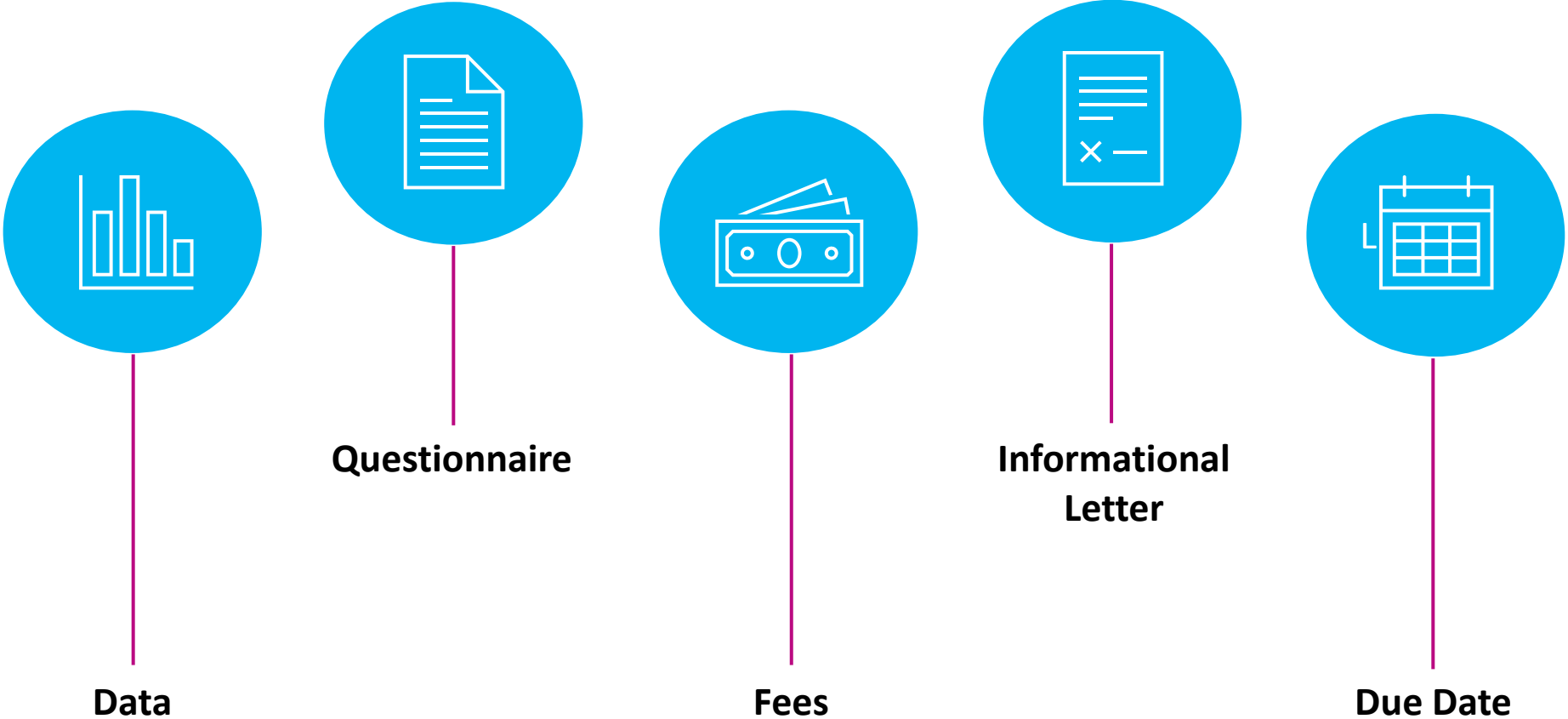
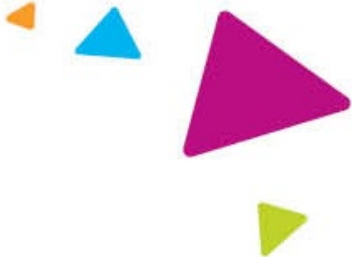


## Client Submission

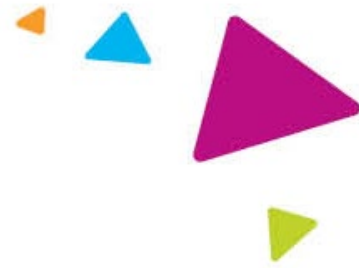
The first submission will be historical data only (2020-2021) and must be submitted within a short timeframe. Therefore, we ask clients for the ability to submit on their behalf this time. For ongoing submissions, we will have more flexibility on who submits. If, however, a client absolutely wants to submit the historical submission, please contact your Account Manager.

For clients submitting their own files, you will receive formatted CSV files no earlier than December 15, 2022.

# Overview of Magellan Rx's Process for Submission



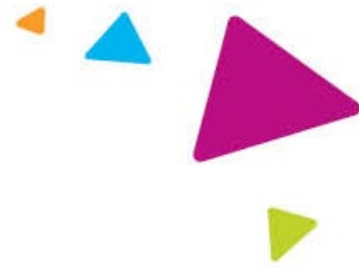
# Data Submission Process



Magellan Rx will aggregate the data at the TPA/client level per the CMS regulations.

Magellan Rx will submit files to CMS for the period in which clients were active. If the client was not a Magellan Rx client for the full historical data time period, their previous PBM is responsible to submit on behalf of the client or provide the data to the client for the time period they were a client of that PBM.

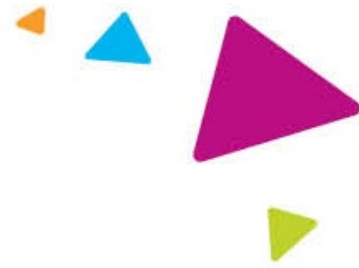
# Data Submission Process, Cont.



Magellan Rx will be submitting P1-P3 files.  
We will **NOT** be submitting D1 and D2 files.  
We will be submitting D3-D8 files.

We will include a narrative response for the files we submit to CMS. Reporting entities for P1-P3, D1 and D2 files will also need to submit a narrative response.

# Questionnaire Process & Submission

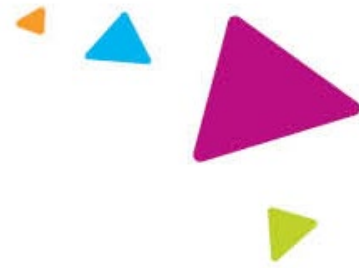


A questionnaire will be sent out to all clients to provide data needed to submit.

In the future, these questionnaires will be sent annually, at the beginning of the year, to gather necessary information and to ensure the accuracy of current information for reporting purposes.

The completed questionnaire must be returned by November 1, 2022.

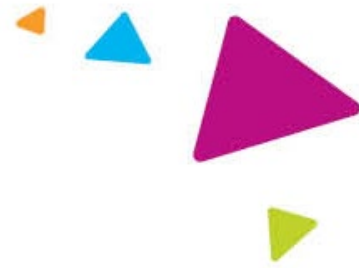
# Applicable Fees



There is a fee associated with this submission. However, the fee will be waived for all current clients.



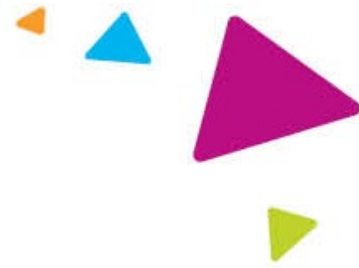
# Informational Letter Requirements



If Magellan Rx will be submitting on a client's behalf, an informational letter will be sent outlining the reporting steps completed by Magellan Rx.

The informational letter will serve as the contract for Magellan Rx to report CAA Section 204 information to CMS.

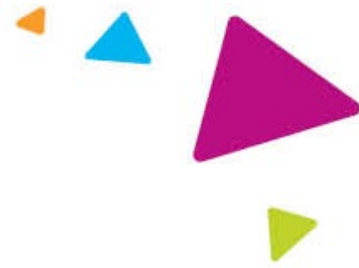
# Submission Due Date



Historical data (reference years 2020 and 2021) is due to CMS by December 27, 2022.

Future submissions are due June 1 following the reference year.

- For 2022 data, the submission is due by June 1, 2023.



# Questions?

**THANK YOU!**

