

CAA Pharmacy Drug Data Collection (RxDC) and Air Ambulance Reporting FAQs

Last updated 4/7/2023

What is the RxDC report?

As described in CMS' [Prescription Drug Data Collection \(RxDC\) Reporting Instructions](#): “[The RxDC report] refers to the data submission required under Section 204 of Division BB, Title II (Section 204) of the Consolidated Appropriations Act, 2021 (CAA). The Rx stands for Prescription Drug and the DC stands for Data Collection.

Section 204 requires group health plans (plans) and health insurance issuers (issuers) offering group or individual health insurance coverage to submit information about prescription drugs and health care spending to the Department of Health and Human Services (HHS), the Department of Labor (DOL), and the Department of the Treasury (the Departments). In addition, the Director of the Office of Personnel Management (OPM) requires Federal Employees Health Benefits carriers (carriers) to submit Section 204 data to HHS. The Centers for Medicare & Medicaid Services (CMS) is collecting Section 204 data submissions on behalf of the Departments and OPM.

The implementing regulations for the Section 204 data collection are at [5 CFR part 890](#), [26 CFR part 54](#), [29 CFR part 2590](#), and [45 CFR part 149](#).”

Additional information regarding RxDC reporting is available on [CMS' website](#).

Employer groups can sign up for email announcements and register for training webinars regarding RxDC reporting at [Registration for Technical Assistance Portal \(REGTAP\)](#).

How is GHC-SCW handling CAA RxDC reporting?

GHC-SCW and its Pharmacy Benefit Manager (PBM) partner submitted all files (P2, D1-D8) for RxDC reporting for reference years 2020 and 2021 prior to the December 27, 2022 deadline for its fully insured employer groups (hereinafter, “employer groups”).

GHC-SCW and its PBM partner will submit all files (P2, D1-D8) for RxDC Reporting for reference year 2022 prior to the June 1, 2023 deadline for its employer groups.

Employer groups will not receive copies of submitted files.

Does GHC-SCW have a written agreement confirming GHC-SCW will submit the RxDC report on behalf of its employer groups?

No, GHC-SCW does not have an independent written agreement regarding RxDC reporting, or any other requirement under the CAA.

Did employer groups receive any notification or confirmation that reference years 2020 and 2021 RxDC reporting was completed?

No, unless requested by an employer group GHC-SCW did not affirmatively communicate any notification or confirmation to its employer groups regarding the reference years 2020 and 2021.

This FAQ may serve as confirmation that GHC-SCW submitted all files (P2, D1-D8) for all employer groups with GHC-SCW plans for reference years 2020 and 2021.

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Will GHC-SCW provide any notification or confirmation that reference year 2022 RxDC reporting has been completed?

GHC-SCW will attempt to provide a mass communication confirming submission of the reference year 2022 RxDC Report.

Will GHC-SCW submit 2022 RxDC reporting for a groups who had GHC-SCW coverage in 2022 and changed carriers for on 1/1/2023?

GHC-SCW will submit 2022 RxDC reports for all groups with coverage with GHC-SCW in 2022.

Effective Date with GHC-SCW:	End Date with GHC-SCW:	GHC-SCW will submit:	Note:
1/1/2022	12/31/2022	Data from 1/1/2022 through 12/31/2022	New carrier will manage RxDC data starting in 2023
After 1/1/2022	12/31/2022	Data from plan start date through 12/31/2022	Work with your old carrier to have 2022 data prior to your GHC-SCW plan start date submitted.
1/1/2022	Prior to 12/31/2022	Data from 1/1/2022 to plan end date	Work with your new carrier to have 2022 data after your GHC-SCW plan end date submitted.

Some carriers have indicated they will no longer submit the D1 file on behalf of its employer groups, what is GHC-SCW's stance on this?

GHC-SCW will complete the D1 file for all employer groups for reference year 2022.

Does GHC-SCW need any information from its employer groups to complete RxDC Reporting for reference year 2022?

Yes, GHC-SCW requires information from its employer groups in order to accurately report average monthly premium paid by members and employers.

Employers must complete this survey by **April 14, 2023**.

GHC-SCW will not be responsible for reporting errors due to inaccurate or incomplete data, or an employer's failure to complete the survey.

Will GHC-SCW submit the required CAA Air Ambulance reporting for all employer groups?

GHC-SCW intends to submit the required CAA Air Ambulance reporting for all employer groups. At this time there is no final rule regarding this reporting requirement and reporting will not begin until a final rule has been published. GHC-SCW will continue to monitor for updates.

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