

# Consolidated Appropriations Act (CAA) Reporting

## WHAT YOU NEED TO KNOW

### BACKGROUND

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- The Consolidated Appropriations Act (CAA) is a new federal reporting regulation that requires health insurers offering group or individual health coverage and self-funded group health plans to report drug utilization and spending trends annual data to the Tri-Agencies.
- In an effort to understand pharmacy/prescription costs, the Tri-Agencies will review submitted data and publish reports on their findings (submitted data will not be publicly posted).
- This legislation is referred to as the [RxDC reporting](#) (or [Pharmacy Benefit and Drug Costs Reporting](#)) (filing instructions are contained within this document)

### DOES THIS APPLY TO YOU?

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- All fully insured commercial, self-insured commercial (ERISA included), Exchange, and FEHB Plans must comply with this regulation

### APPLICABLE TIMEFRAMES

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- The data collection period is August 29, 2022 thru September 30, 2022
- The first compliance date is December 27, 2022 for reporting years 2020 and 2021
- Future years reporting will be due June 1 annually (2022 data will be due June 1, 2023)
- The first submission is for reference years 2020 (containing 2019 and 2020 data) and 2021 (2020 and 2021 data)
- CMS Enterprise Portal for submission is <https://portal.cms.gov/portal/>

## YOUR ROLE

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Engage with your PBM vendor to ensure appropriate and timely data collection. If you had multiple PBM vendors, including a carveout PBM, for the applicable reference years, you will need to coordinate data collection efforts among all parties.

## DATA FIELDS TO PROVIDE TO YOUR 2020 AND 2021 PBM VENDOR

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- Official Plan Name from your 5500
- EIN on the 5500
- State of Headquarters
- Market Segment Type: Self-funded or Fully Insured

## WHAT ARE THE REQUIRED REPORTING TEMPLATES?

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- Plan Lists (Individual and Student, Group Health Plan List, and FEHB Plan List)
- Data Files (Reporting of aggregated data based on state and market segment)
- Premium and Life-Years Reporting
- Spending by Category Reporting
- Top 50 Most Frequent Brand Drugs Reporting
- Top 50 Most Costly Drugs Reporting
- Top 50 Drugs by Spending Increase Reporting
- Rx Totals Reporting
- Rx Rebates by Therapeutic Class Reporting
- Rx Rebates for the Top 25 Drugs Reporting

## HOW OPTIMUM CAN HELP

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Optimum is a vendor management firm that focuses exclusively on the HR supply chain with turnkey solutions that improve the financial, operating performance, transparency and accountability of HR Benefit programs while still maintaining existing vendor relationships.

[Please contact us](#) with any questions about this regulation, your PBM vendor, or any other HR related issues.