

BLUE CROSS BLUE SHIELD OF MASSACHUSETTS

CAA RX DC SUMMARY OF SUBMISSIONS OPTIONS

2025 (2024 DATA)

- a. *Fully-insured*: BCBSMA will submit all RxDC data for benefits we administer and the appropriate narrative. This includes the P2 (Group Health Plan), D1 (Premium and Life Years), and D2 (Medical Spending by Category) files, as well as the D3-D8 files pertaining to prescription drug benefits.
- b. *Self-insured (ASC) – with Rx benefits administered by BCBSMA*: BCBSMA is offering to submit the P2, D1, and D2 files (for benefits we administer), as well as the D3-D8 files, along with appropriate narrative.
- c. *Self-insured (ASC) – with Rx benefits administered by another vendor*: BCBSMA is offering to submit the P2, D1, and D2 files (for benefits we administer), along with appropriate Narrative. These accounts must work with their outside vendor to submit their D1, and D3-D8 files for the Pharmacy benefit and corresponding P2 files by the deadline.
- d. *Alternative opt-out approach (ASC only)*: The customer may request their data from BCBSMA via the below-mentioned BCBSMA 2023 RxDC Plan Sponsor Survey and opt to submit the data and appropriate Narrative themselves, or engage a third party to submit the data for them. ASC customers wishing to do their own submission should speak with their BCBSA account service team.
 - i. *Self-insured (ASC) opt out – with Rx benefits administered by BCBSMA*: BCBSMA will be providing the account its available data for its P2 and D2-D8 files, but **these accounts must sign a non-disclosure agreement (NDA)** in order to access relevant prescription drug data as provided by our PBM. The account is responsible for data collection of its D1 file.

Access to the NDA is found in the BCBSMA 2025 RxDC Plan Sponsor Survey; accounts that are choosing to self-submit and have prescription drug coverage with BCBSMA must also disclose the name of their third-party vendor who will be accessing the prescription drug data sent by BCBSMA and its PBM (only if applicable). BCBSMA must approve an indicated vendor before data is submitted to the account.

- ii. *Self-insured (ASC) opt out – with Rx benefits administered by another vendor*: BCBSMA will be providing the account its available data for its P2 and D2 files, and no NDA is necessary. The account is responsible for data collection and submission of its D1 and D3-D8 files pertaining to its Rx benefits, as well as associated P2 files.
- iii. *Self-insured (ASC) partial opt-out*: BCBSMA is offering to submit the P2 and account's relevant D files (for benefits we administer), along with appropriate Narrative – except for the account's D1 file. Account is responsible for data collection and submission of its D1 file and associated P2 file.

Pertaining to the alternative opt-out approach for ASC accounts, BCBSMA is aiming to send applicable data to customers by May 20, 2025.

Note that BCBSMA is not asking for or including any data related to benefits it does not administer in its RxDC submission. Plan sponsors will need to coordinate its RxDC submissions with its health service vendors for other benefits outside of those administered by BCBSMA. The plan sponsor may be required to submit a P2 filing listing the names and EIN's of all its health service vendors that are submitting RxDC filings on their behalf.

As an additional resource, please review the following table pertaining to BCBSMA RxDC submission options:

Financial Arrangement	Pharmacy Coverage	Who submits the RxDC filing?	RxDC submission	Further Actions
Fully Insured	BCBSMA	BCBSMA for benefits it administers	BCBSMA submits P1 or P2 files and D1-D8 for benefits it administers.	No further action needed.
Self-Insured (ASC)	BCBSMA	BCBSMA for benefits it administers	BCBSMA submits D1-D8 and associated P2 files for benefits it administers.	No further action needed.
Self-Insured (ASC) – <i>Alternative opt-out approach (i)</i>	BCBSMA	Plan Sponsor	BCBSMA will not submit any files on plan sponsors behalf.	Plan sponsor needs to sign NDA (link embedded in survey) and email to email noted in the NDA. Upon receipt of the NDA and subsequent approval, BCBSMA will provide D2-D8 and applicable P2 files to the plan sponsor's primary contact.
Self-Insured (ASC) <i>Alternative partial opt-out approach (iii)</i>	BCBSMA	Plan Sponsor submits D1. Other data files submitted by BCBSMA	BCBSMA will submit D2-D8 and associated P2 files for benefits it administers on behalf of plan sponsor. Plan sponsor will submit D1 and associated P2 files.	BCBSMA will not provide any data files to the plan sponsor.
Self-Insured (ASC)	Non-BCBSMA	BCBSMA for benefits it administers	BCBSMA will submit partial D1, D2 and associated P2 files for benefits it administers on behalf of the plan sponsor. Plan sponsor will be responsible for submission of related D1(for pharmacy and other coverage), D3-D8 and associated P2 files.	BCBSMA will not provide any data to plan sponsor.
Self-Insured (ASC) <i>Alternative partial opt-out approach (ii)</i>	Non-BCBSMA	Plan Sponsor	BCBSMA will not include plan sponsor in its RxDC filing	BCBSMA will provide D2 and associated P2 files to plan sponsor's primary contact.
Self-Insured (ASC) <i>Alternative partial opt-out approach (iii)</i>	Non-BCBSMA	Plan sponsor submits D1. BCBSMA submits D2.	BCBSMA will submit D2 and associated P2 file on behalf of plan sponsor. Plan sponsor will submit D1, D3-D8 and associated P2 files	BCBSMA will not provide any data to the plan sponsor