

# Transparency in Coverage

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## Overview of Transparency in Coverage Requirements



# Machine-Readable Files (MRFs)

- In-network negotiated rates
- Out-of-network allowed amounts
- Prescription drug negotiated rates and historic net prices



#### **Cost Estimator Tool**

Internet-based self-service tool that provides personalized, real-time estimate of cost-sharing for a covered item or service for a specific in-network provider. Based on a descriptive term or billing code searched by the enrollee.



# Advanced Explanation of Benefits (AEOB)

Personalized, real-time estimate of cost-sharing for a scheduled service for a specific in-network provider based on billing code(s) submitted by the provider to the issuer via a Good Faith Estimate (GFE).

Apply to most non-grandfathered group health plans and issuers in the individual & group markets

## **Reminder: Implementation Status**

#### October 2020

Tri-Agencies
Transparency
in Coverage
Final Rules\*
adopt MRF
and cost
calculator
requirements

#### 7/1/22

In-network and OON MRFs Implemented

#### 1/1/24

Cost estimator tools available for all items & services

#### **TBD**

AEOBs

(proposed rule Spring 2025?)















## December 2020

Consolidated
Appropriations
Act, 2021
enacted,
including No
Surprises Act
AEOB
requirement

#### 1/1/23

Cost
estimator
tools
available for
500
"shoppable"
services

#### **TBD**

Rx drug MRFs

<sup>\*</sup> Implemented under section 1311(e)(3) of the ACA

## Overlapping Requirements, Different Consumer Value



#### **MRFs**

- X Real time
- X Personalized
- X Accumulated amounts
- X Provider's expected charges



### **Cost Estimator Tool**

- √ Real time
- ✓ Personalized
- ✓ Accumulated amount
- X Provider's expected charges

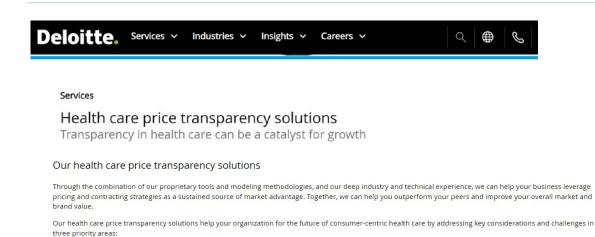


#### **AEOB**

- √ Real time
- ✓ Personalized
- ✓ Accumulated amounts
- ✓ Provider's expected charges

Consumer-facing tools

## **Machine-Readable Files**





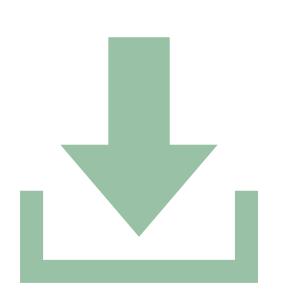






## Machine-Readable Files

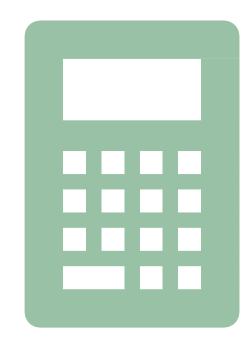
- Not consumer-friendly
- Not personalized, specific, or real-time
- Large & complex
- State Activity
- Next up:
  - Rx MRF implementation
  - Potential future updates



## **Cost Estimator Tools**

## **2023 AHIP Member Survey Findings**

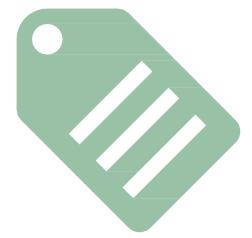
- <10% enrollees accessed cost estimator tool</li>
- Most frequently searched services:
  - Colonoscopy
  - Vaginal delivery
  - Mammogram
  - Physical therapy
  - Vasectomy
  - Behavioral health
  - Eye exam
  - Dentist
  - Mental health
  - Office visit
  - C-section
  - Urgent care
- Next up: Consumer education
  - Availability of tool
  - How to search for costs
  - How to use cost information to make health care decisions



## **AEOBs**

- Holds potential to provide the most accurate estimate
- Implementation will be extremely complex
- Next up: Standards designation and proposed rulemaking





## What's Next for States?

- Prioritize solutions that provide direct consumer value
- Consider approaches to expand consumer awareness & education of tools
- Avoid single-state solutions
- Engage on next iteration of review/updates to Federal MRF requirements



# Thank You

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