



EMERSON ROGERS

2024 RxDC Reporting Reminder



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The Centers for Medicare and Medicaid Services (“CMS”) previously released updated Prescription Drugs Data Collection (“RxDC”) reporting instructions related to reporting 2024 data; there are no changes between the 2023 and 2024 instructions. The deadline to report 2024 RxDC data to CMS is **June 1, 2025**.

Background

Plan sponsors of group health plans (typically, employers) must submit information annually about prescription drugs and health care spending (“RxDC reporting”) to CMS. The next deadline is **June 1, 2025**, for reporting on calendar year 2024. This is a firm deadline date, which falls on a Sunday in 2025.

It is important to note that carriers, pharmacy benefit managers (“PBMs”), and third-party administrators (“TPAs”) assisting with the reporting may have earlier deadlines for employers to respond to them with certain data points (e.g., plan name, average monthly premiums).

RxDC reporting consists of uploading to CMS a total of nine spreadsheets, consisting of a plan list (P2 is used for group health plans) and eight data files (D1 through D8), plus a “narrative response.” In some situations, a TPA or PBM will not handle the full filing. This often requires the employer to file at least the D1 file, and occasionally the D2 file. A P2 list file must accompany all “D” filings.

HIOS Guidance

The HIOS RxDC User Manual and RxDC HIOS Access Guide were updated in April 2024. If an employer needs to submit one (or more) of the “D” files (e.g., D1) on behalf of the group health plan because a TPA or PBM is not handling the full filing, the employer must sign up for a HIOS account.

Employer Action

Employers should:

- Work with carrier partners, TPAs, PBMs and other vendors, as appropriate, to submit the requisite 2024 data and submit RxDC reporting.
- Understand whether the employer will be responsible for submitting any of the information to HIOS. For example, when an employer offers a self-funded health plan where stop loss insurance is carved out, the employer may be responsible for furnishing stop loss information by filing a P2 and D1 with HIOS.

The instructions are very helpful and answer questions about the filing requirement and provide relevant examples when appropriate.

We will continue to monitor and inform you of any applicable changes.